Exhibit 76:

Jami Selden-Manor Deposition Transcript

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Transcript of the Testimony of
Selden-Manor, Jami

Date: June 12, 2023
Volume:

Case: JOHN DOES A, et al. v. GRETCHEN WHITMER, et al.

Printed On: June 26, 2023

Selden-Manor, Jami
6/12/2023   FIRM #8093

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JOHN DOES A, B, C, D, E, F, G,
H, MARY DOE and MARY ROE, on
behalf of themselves and all
others similarly situated,
        Plaintiffs,
    vs.   Case No. 2:22-cv-10209
                   Hon. Mark A. Goldsmith
                   Mag. Curtis Ivy, Jr.
GRETCHEN WHITMER, Governor of
the State of Michigan, and COL.
JOSEPH GASPER, Director of the
Michigan State Police, in their
official capacities,
        Defendants.
_____

        The Deposition of JAMI SELDEN-MANOR,
        Taken via videoconference,
        DeWitt, Michigan,
        Commencing at 9:01 a.m.,

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1   The Deposition of JAMI SELDEN-MANOR,
2   Taken via videoconference,
3   DeWitt, Michigan,
4   Commencing at 9:01 a.m.,
5   Monday, June 12, 2023,
6   Before Heather DeMar, RPR, CSR-8951.
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1   APPEARANCES
2
3   DAYJA TILLMAN - P86526
4   and MIRIAM AUKERMAN - P63165
5   American Civil Liberties Union of Michigan
6   1514 Wealthy Street SE, Suite 260
7   Grand Rapids, MI 49506
8   616.301.0930
9   Appearing on behalf of the Plaintiffs.
10
11
12 SCOTT DAMICH - P74126
13 Michigan Department of Attorney General
14 525 West Ottawa Street
15 Lansing, Michigan 48933
16 517.335.7573
17   Appearing on behalf of the Defendants.
18
19
20 ALSO PRESENT:
21 AIMEE BRIMACOMBE - MICHIGAN STATE POLICE REPRESENTATIVE
22
23
24
25

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1 (Pages 1 to 4)

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1    DeWitt, Michigan
2    Monday, June 12, 2023
3    9:01 a.m.
4        .
5             JAMI SELDEN-MANOR,
6    was thereupon called as a witness herein via
7    videoconference, where all parties stipulate to the
8    witness having first been duly sworn in remotely to
9    testify to the truth, the whole truth and nothing but
10   the truth, was examined and testified as follows:
11             MS. TILLMAN:  So good morning, my name is
12   Dayja Tillman.  I'm an attorney for the plaintiffs in
13   this matter and I'll be conducting your deposition
14   this morning.  Before we --
15             THE WITNESS:  Good morning.
16             MS. TILLMAN:  Good morning.  Before we jump
17   in, I wanted to kind of explain the purpose of today's
18   deposition.  As you probably know, it's a 30(b)(6)
19   deposition.  So you've been designated by your
20   organization to speak on its behalf about matters
21   relevant to this litigation that were specifically
22   outlined in the Notice of deposition that you should
23   have received.
24             So you're here today just to share the
25   knowledge that the organization has about those topics
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1    listed in that Notice.  Does that make sense?
2             THE WITNESS:  Yes.
3             MS. TILLMAN:  Perfect.  Perfect.  And so,
4    have you ever had your deposition taken before?
5             THE WITNESS:  On a personal matter.
6             MS. TILLMAN:  On a personal matter.  When
7    was that?
8             THE WITNESS:  Around 2016.
9             MS. TILLMAN:  And it was a civil case?
10            THE WITNESS:  Yes.
11            MS. TILLMAN:  Perfect.  Perfect.  And so,
12   just -- I'm going to go over some basic rules just in
13   terms of the deposition, just in case you might have
14   -- you may already know, you know, these rules, I want
15   to put the reminders out there just so it's helpful
16   for the way that the deposition proceeds.
17            So the first thing is I'll ask you to
18   respond to my questions verbally.  The court reporter
19   can't take down non-verbal gestures or head nods.  So
20   even if it's a yes or no, it's usually best to answer
21   verbally, if that makes sense.
22            THE WITNESS:  You're cutting out.  I only
23   got half of that.  Was that my end?
24            MS. TILLMAN:  Was I cutting out for
25   everyone else?  I can just repeat it just in case it
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1    was your mic on your end.
2             THE WITNESS:  Thank you.
3             MS. TILLMAN:  So the first thing, first
4    rule is just make sure you respond to my questions
5    verbally.  Because the court reporter can't take down
6    non-verbal gestures or head nods or anything like
7    that.  If it's a yes or no question, it's best to
8    answer verbally.  Does that make sense?  Did you hear
9    it that time?
10            THE WITNESS:  You're freezing up on my end.
11   I might have to go to a different connection.  Let me
12   go to my hotspot.
13            MS. TILLMAN:  I assume it was okay for
14   everybody else still.
15            THE WITNESS:  I'm assuming it's mine.  I --
16   it just came up that it was freezing up.  So we have
17   some bad weather here and we're on satellite so bear
18   with me.
19            MR. DAMICH:  Off the record.
20            MS. TILLMAN:  No problem.
21            (Off the record 9:04 a.m.)
22            (Back on the record at 9:04 a.m.)
23            MS. TILLMAN:  Back on the record.  So
24   just -- the first of the ground rules is just to try
25   your best to respond verbally, because the court
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1    reporter can't take down non-verbal gestures and head
2    nods.  Does that make sense?
3             THE WITNESS:  Yes.
4             MS. TILLMAN:  Perfect.  And the second
5    ground rule is it's important that we don't talk over
6    each other.  The court reporter is taking down every
7    word that we're saying.  So it's a lot easier for her
8    to keep up with what we're saying if we are all
9    speaking at once.  Sorry, my computer just started
10   going off.  I'll try my best to not talk over you and
11   hopefully you can do the same.
12            And then third, I may ask you a question,
13   at that point you need some clarification.  If that
14   happens, can you just ask me to clarify or rephrase my
15   question and I'm -- I can try my best to do so.
16            THE WITNESS:  Yes.
17            MS. TILLMAN:  Perfect.  And if you answer a
18   question, is it fair to assume you understood it?
19            THE WITNESS:  I'm sorry, what was that?
20            MS. TILLMAN:  If you answer a question, is
21   it fair to assume you understood the question?
22            THE WITNESS:  Yes.
23            MS. TILLMAN:  Perfect.  And throughout the
24   deposition today, your counsel may object to a
25   question that I have asked.  Unless he instructs you
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2 (Pages 5 to 8)

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1 not to answer the question, you should usually still	1 THE WITNESS: I only got half of that, I'm
2 answer the question. Does that make sense?	2 sorry.
3 THE WITNESS: Okay. Yes.	3 MS. TILLMAN: No problem. Is there
4 MS. TILLMAN: Perfect. And finally --	4 anything in front of you at the moment that you might
5 THE WITNESS: It's still coming up that my	5 be referring to over the course of the deposition?
6 bandwidth is low. So I'm not really sure. I'm on a	6 THE WITNESS: No.
7 hotspot. There shouldn't be a problem. If I freeze	7 MS. TILLMAN: Gotcha. And is there anyone
8 up, please let me know.	8 there with you?
9 MS. TILLMAN: For sure. Thank you for	9 THE WITNESS: No. Everybody has been
10 letting us know. Finally, if you at any point during	10 kicked out of my room.
11 the deposition -- I don't intend this deposition to be	11 MS. TILLMAN: Perfect. And are you under
12 very long. If at some point you do need a break, you	12 the influence of any medications or any other
13 should just feel free to ask for one.	13 condition that would impact your ability to answer
14 The only thing I ask is if there's a	14 truthfully today?
15 pending question out there, you just answer that	15 THE WITNESS: No.
16 question first and then we take a break. Does that	16 MS. TILLMAN: Perfect. Perfect. And I
17 sound fair?	17 want to make sure I'm saying your name correctly just
18 THE WITNESS: Yes.	18 when I reference it, do you go by Ms. Selden-Manor or
19 MS. TILLMAN: Perfect. Perfect. And since	19 by -- am I saying it wrong?
20 we're doing this by Zoom, I did want to clarify, where	20 THE WITNESS: Ms. Selden-Manor, yes.
21 are you located today?	21 MS. TILLMAN: Perfect. Awesome. All
22 THE WITNESS: DeWitt, Michigan.	22 right.
23 MS. TILLMAN: And is there anything in	23 EXAMINATION
24 front of you that you might be referring to over the	24 BY MS. TILLMAN:
25 course of the deposition?	25 Q. So did you do anything to prepare for your deposition
Page 9	Page 10
1 today?	1 MS. TILLMAN: Off the record.
2 A. I met with my staff, yes.	2 (Off the record 9:09 a.m.)
3 Q. Did you do anything else?	3 (Back on the record at 9:11 a.m.)
4 A. Yes.	4 MS. TILLMAN: Back on the record.
5 Q. What else did you do?	5 BY MS. TILLMAN:
6 A. I reviewed policy.	6 Q. And I think that last question I was asking was did
7 Q. What policies did you review?	7 you review any other documents in preparation for the
8 A. Several, I couldn't name them all without having them	8 deposition aside from the policies you just referred
9 in front of me.	9 to?
10 Q. For sure. Were they related to the internal policies	10 A. No.
11 and procedures kind of of the SOR unit generally?	11 Q. Gotcha. And without telling me what you talked about,
12 A. Yes.	12 did you meet with your attorneys in preparation for
13 Q. Gotcha. And did you review anything else or do	13 this deposition?
14 anything else to prepare?	14 A. Can you repeat that question. You're cutting out
15 A. No.	15 again.
16 Q. And aside from the policies and procedures that we	16 Q. Without revealing or indicating what you talked about,
17 kind of just mentioned, did you review any other	17 did you meet with your attorneys to prepare for this
18 documents that were related to the case at all?	18 deposition?
19 A. You were cutting out, I'm sorry.	19 A. Yes.
20 Q. No problem. Other than the policy that we just kind	20 Q. Gotcha. And how many times did you meet with your
21 of -- just briefly discussed, did you review any other	21 attorneys?
22 documents related to the case?	22 A. Once.
23 A. Can I try another wi-fi connection.	23 Q. And how long was that --
24 Q. Perfectly fine.	24 A. Actually twice, my apologies, we did have a
25 A. Sorry.	25 pre-meeting.
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3 (Pages 9 to 12)

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1 Q. Gotcha. And were those meetings in preparation for	1 A. You cut out again.
2 this deposition?	2 Q. Where did you go after high school?
3 A. Yes.	3 A. I went to Lansing Community College.
4 Q. Gotcha. And did you speak with anyone besides your	4 Q. And what year did you graduate from Lansing Community
5 attorneys about your deposition?	5 College?
6 A. Yes.	6 A. I did not graduate from there.
7 Q. And who was -- who were those people?	7 Q. How long were you attending?
8 A. My staff.	8 A. Probably about ten years, off and on.
9 Q. And what did you talk about?	9 Q. What were you studying --
10 A. I just told them that I was being deposed today and I	10 A. I --
11 wasn't going to be available.	11 Q. What were you studying?
12 Q. Gotcha. Perfect. And just finally, did you do	12 A. Basics, basic classes.
13 anything else at all to prepare?	13 Q. And any other education aside from those two, high
14 A. No.	14 school and Lansing Community College?
15 Q. Gotcha. All right. So let's talk a little bit about	15 A. Yes.
16 your education background. Did you finish high	16 Q. What other education is that?
17 school?	17 A. I completed my Associate's and Bachelor's at Cleary
18 A. Yes.	18 University.
19 Q. And where did you go to high school?	19 Q. And what year did you finish?
20 A. I graduated from West Junior in Lansing.	20 A. I knew you would ask me that. It was during COVID, I
21 Q. And what year did you graduate?	21 want to say 2019, 2020, somewhere in there.
22 A. '96, 1996.	22 Q. Got it. Perfect. And what were your -- what was your
23 Q. And any further education after that?	23 degree in?
24 A. Yes.	24 A. You cut out again.
25 Q. And where did you go after high school?	25 Q. No problem. I was asking what did you get your
Page 13	Page 14
1 Bachelor's degree in? I think I cut out again.	1 A. Yes.
2 A. I just heard you.	2 Q. Where did you work?
3 Q. I'll try again. The question is what did you get your	3 A. It was a rent-to-own company, I think it was Liberty
4 Bachelor's degree in?	4 rent-to-own. They're no longer in business, so I
5 A. Business administration.	5 can't remember the name. I was a receptionist.
6 Q. Business administration, thank you. And do you have	6 Q. Okay. And how long were you there for?
7 any other education beyond your Bachelor's degree?	7 A. Less than two years.
8 A. No.	8 Q. Less than two years. And where did you go after that?
9 Q. Do you have any training, certifications, anything	9 A. I worked for a temp agency that placed me at
10 like that?	10 Hasselbring-Clark.
11 A. Yes.	11 Q. How long were you there?
12 Q. What trainings do you have?	12 A. Approximately four years.
13 A. Many criminal justice trainings provided by the State	13 Q. And did you go anywhere after that?
14 of Michigan or outside agencies, computer technology	14 A. I worked -- my screen just disappeared, sorry. I can
15 type. I don't have a list in front of me to give you.	15 hear you, but I couldn't see you. Okay.
16 Q. For sure. For sure. Do you recall about how long ago	16 I went to work at the library of Michigan
17 you might have taken some of those trainings?	17 for the State of Michigan.
18 A. Over the last twenty-plus years.	18 Q. And how long were you there?
19 Q. And do you happen to have any licenses?	19 A. Three years, approximately.
20 A. No.	20 Q. And where to after that?
21 Q. Gotcha. And so, I want to talk a little bit now about	21 A. I went to FIA, which is now DHHS.
22 your work history. Did you work at all after high	22 Q. What was your role there?
23 school?	23 A. I worked in disability, the determination services. I
24 A. Yes.	24 was an accounting assistant.
25 Q. Or immediately after high school?	25 Q. Gotcha. How long were you there?
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4 (Pages 13 to 16)

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1 A. Less than a year.	1 Police was as the SOR unit manager or --
2 Q. And then where to after that?	2 A. Yes.
3 A. Department of Natural Resources.	3 Q. -- departmental manager?
4 Q. And your role there was?	4 A. Yes.
5 A. I started out as a departmental technician and	5 Q. Gotcha. And so, you've been the manager for about
6 promoted up to a specialist thirteen.	6 four months or so?
7 Q. How long were you there?	7 A. It -- not even three months.
8 A. Over twenty years.	8 Q. Gotcha.
9 Q. And where did you go after that?	9 A. Yes.
10 A. Michigan State Police.	10 Q. And have you -- aside from the positions that we
11 Q. Michigan State Police. And before I ask you questions	11 talked about, have you done any previous work on or
12 about the Michigan State Police, I wanted to follow up	12 with the Michigan Sex Offender Registry prior to this
13 just really quickly.	13 position?
14 In all of the -- in all the roles we just	14 A. No.
15 talked about, did any of them relate to your current	15 Q. Gotcha. All right. And I know you are obviously
16 job at all, the responsibilities and duties that you	16 relatively new to the position, but I want to ask you
17 currently -- you're currently performing?	17 a couple of questions.
18 A. No. No.	18 Were you involved at all in responding to
19 Q. Gotcha. All right. Perfect. So when did you start	19 the discovery requests in this case?
20 working for the Michigan State Police?	20 A. No.
21 A. March 19th of '23.	21 Q. Gotcha. And do you know if anyone you currently
22 Q. And what position was that for?	22 supervise was involved in responding to the discovery
23 A. My current position is the departmental manager for a	23 questions in this case?
24 team.	24 A. I don't -- I do not know.
25 Q. So the -- your first job with the Michigan State	25 Q. Gotcha. And so, as the manager, what are your
Page 17	Page 18
1 responsibilities?	1 Q. Don't know, gotcha. And I assume -- you just answered
2 A. I oversee the SOR unit. There's ten employees,	2 this, but do you supervise -- do you supervise anyone
3 technicians and analysts.	3 in your role?
4 Q. Gotcha. Anything else?	4 MR. DAMICH: Objection, asked and answered.
5 A. I review policy and procedure within the unit.	5 THE WITNESS: Yes.
6 Q. And anything else?	6 BY MS. TILLMAN:
7 A. Review trainings; that's part of my PD, but I haven't	7 Q. And who do you supervise in your role?
8 done that yet.	8 A. I supervise ten employees. Do you need their names?
9 Q. All right. Do your responsibilities as manager	9 Q. No, no, I don't need their names. Those employees are
10 require you to work with the MSOR database vendor	10 techs and analysts in the SOR unit?
11 ever?	11 A. Yes.
12 A. Yes.	12 Q. Do you supervise anyone else besides the techs and
13 Q. And what responsibilities do you have working with the	13 analysts?
14 MSOR database vendor?	14 A. No.
15 A. I oversee the analyst that works directly with that	15 Q. Is your job different from those you supervise?
16 vendor. I meet with them in meetings, go over issues	16 A. Yes.
17 relating to the system.	17 Q. And how is it different?
18 Q. Gotcha. And do you know if the responsibilities of	18 A. I oversee their duties. I don't do their job. I
19 the SOR unit manager -- the SOR unit manager have	19 oversee them.
20 changed since you entered the role?	20 Q. Gotcha. Does part of your supervision duties include
21 A. No.	21 ensuring the techs and analysts comply with the
22 Q. So your responsibilities are more or less the same as	22 standards and procedures of the SOR unit?
23 the previous manager in your position, to your	23 A. Yes.
24 knowledge?	24 Q. And how do you ensure that?
25 A. I don't know that.	25 A. I'm -- I ensure that they're following the policies
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1   and procedures that have been approved.
2   Q. And is there any mechanism that makes that easier for
3   you?
4   A. I sit with them and ensure that they're doing their
5   job accordingly to the policies and procedures that
6   have been approved.
7   Q. Gotcha. And who is your direct supervisor?
8   A. First Lieutenant Alan Renz.
9   Q. And what's their role or position?
10 A. He is the section manager.
11 Q. And is he also in the SOR unit?
12 A. He oversees the SOR unit.
13 Q. Who does he report to?
14 A. Mr. Shawn Sible.
15 Q. And do you know how long he's been in that position?
16 A. No.
17 Q. So and -- my understanding based on what we've kind of
18   already talked about is in your role, you're
19   responsible for carrying out internal policies and
20   procedures, correct?
21 A. I'm responsible for the techs and analysts carrying
22   out those policies and procedures.
23 Q. Gotcha. And did you receive any training when you
24   became the SOR unit manager?
25 A. No.

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1   Q. No training at all?
2   A. I received training with my employees.
3   Q. And can you describe what that training looked like.
4   A. I sat with each one of them, went over their daily
5   duties and their position descriptions, along with the
6   policies and procedures.
7   Q. Did you -- which policies and procedures did you go
8   over with them during those trainings?
9   A. All that we have approved. I can't give you a list of
10   numbers without seeing them.
11 Q. Gotcha. Do you know how many policies and procedures
12   that might be just off the top of your head?
13 A. I do not know.
14 Q. Gotcha. And did you receive personally any materials
15   or resources just when you became the manager for your
16   reference or guidance?
17 A. Yes.
18 Q. And what kind of resources and materials did you
19   receive?
20 A. Cheat sheets, copy of previous law, links to those
21   laws.
22 Q. Gotcha. And what kind of cheat sheets did you
23   receive?
24 A. The PACC code table, out of state -- I forget the name
25   of it, but it's referring to out-of-state offenders.

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1   Q. Gotcha. And during your kind of like onboarding
2   process, were you trained on any specific programs?
3   A. MSOR.
4   Q. And the -- the MSOR database?
5   A. Yes.
6   Q. Gotcha. What kind of training did you receive on
7   that?
8   A. Hands-on training with each analyst and technician.
9   Q. And how long -- about how long did that take?
10 A. I spent approximately two hours with each person.
11 Q. Gotcha. And sometimes when a person starts a new job,
12   they learn from the people who already work there. So
13   have you been able to learn from other staff within
14   the SOR unit at all to kind of get more up to speed on
15   your responsibilities and duties?
16 A. Yes.
17 Q. And from who were you able to kind of get that
18   guidance and kind of practice?
19 A. All of my staff.
20 Q. All of your staff. Anyone besides the techs and
21   analysts that you supervise?
22 A. I have reached out to the previous SOR unit manager.
23 Q. Gotcha. And what did you reach out to the previous
24   SOR unit manager about?
25 A. Looking for previous emails, asking questions on

                        Page 23

1   processes.
2   Q. Gotcha. And I believe you already testified to being
3   aware of the different operating procedures that are
4   outlined for the SOR unit, correct?
5   A. Yes.
6   Q. Perfect. And so, do you know if those -- those SOR
7   operating procedures are written within the SOR unit?
8   A. Yes.
9   Q. And do you know who is involved in writing them?
10 A. Yes.
11 Q. Who is that?
12 A. My analysts and the SOR unit manager.
13 Q. Have you been -- since arriving to the SOR unit, have
14   you been involved in writing any of the policies?
15 A. I have not been involved in finalizing policies.
16 Q. Have you otherwise been involved in drafting or
17   consulting on them?
18 A. Yes.
19 Q. Which ones were those?
20 A. Out-of-state PRP, we're reviewing those now.
21 Q. Gotcha. And if you know, what changed about the
22   operating procedures that you're currently involved in
23   helping draft or consult on?
24   MR. DAMICH: Objection, this is starting to
25   delve into process of things that are currently being

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                                        6 (Pages 21 to 24)

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1 worked on and potentially changed. I'd ask that she	1 what is published on the Michigan Sex Offender
2 not answer that.	2 Registry?
3 MS. TILLMAN: Fair enough. We will move	3 A. Yes.
4 on.	4 Q. Perfect. So do you know if there's a fee to search
5 MR. DAMICH: Thank you.	5 the registry?
6 BY MS. TILLMAN:	6 A. I don't believe so.
7 Q. Are you familiar with the process of amending or	7 Q. Gotcha. Do you know if there are fees associated with
8 revising operating procedures in the SOR unit?	8 running background checks?
9 A. Yes.	9 A. I do not know.
10 Q. Is there a review process?	10 Q. Gotcha. Do you know if you can run a search on the
11 A. Yes.	11 Michigan Sex Offender Registry without a name?
12 Q. And are you involved in that process?	12 A. I do not know. Yes, sorry, yes, you can run it by
13 A. Yes.	13 location.
14 Q. And who signs off on like final changes?	14 Q. Gotcha. Gotcha. Do you know if the same is true for
15 A. The SOR unit manager.	15 a background check?
16 Q. Gotcha. I'm going to switch gears a little bit here.	16 MR. DAMICH: Objection, lack of foundation.
17 So from the previous work experience that we kind of	17 BY MS. TILLMAN:
18 just -- that we previously went over, do you have	18 Q. You can still answer if you know.
19 experience at all with doing background checks?	19 A. I don't know.
20 A. Yes.	20 Q. Can you run an -- in your experience, have you been
21 Q. And what experience would that be?	21 able to run a background check on an address or a
22 A. I worked for law enforcement division for Department	22 geographical location?
23 of Natural Resources, doing background checks on	23 MR. DAMICH: Objection, ambiguous.
24 employees and recruits.	24 BY MS. TILLMAN:
25 Q. And as the SOR unit manager, you are familiar with	25 Q. You can still answer.
Page 25	Page 26
1 A. Yes.	1 A. Can you elaborate what you mean by personal
2 Q. And does being able to run a check on the Michigan Sex	2 information.
3 Offender Registry without a name, say, using an	3 Q. So -- for sure. So does the Sex Offender Registry
4 address or a geographical location, does that allow a	4 show a picture and physical description of
5 registry user to find out that a person has a sex	5 registrants?
6 offense history, even when they aren't necessarily	6 A. Yes.
7 looking for that specific information or background?	7 Q. And does that show up on a background check, to your
8 MR. DAMICH: Objection to form, it's	8 knowledge?
9 compound, ambiguous, confusing.	9 MR. DAMICH: Objection, lack of foundation.
10 BY MS. TILLMAN:	10 BY MS. TILLMAN:
11 Q. You can answer if you understand the question.	11 Q. You can answer if you know.
12 A. I don't understand the question.	12 A. Yes.
13 Q. I can rephrase. So because the registry does not	13 Q. Are you familiar with the MDOC's Offender Tracking and
14 require a name in order to run a search, does that	14 Information System background check?
15 allow a user who's using the registry to run a search	15 A. I'm sorry, can you repeat that question.
16 on a particular person to find information they	16 Q. Yeah, no problem. Are you familiar with MDOC's
17 weren't necessarily looking for?	17 Offender Tracking and Information System background
18 MR. DAMICH: Same objection.	18 check?
19 BY MS. TILLMAN:	19 A. Yes.
20 Q. You can answer if you know the answer.	20 Q. And do you know if they have photos?
21 A. I didn't understand the question.	21 A. I don't know.
22 Q. Gotcha. We can move on. It's okay.	22 Q. Are you familiar with the MSP's Internet Criminal
23 To your knowledge, does the public Sex	23 History Access Tool?
24 Offender Registry provide personal information on	24 A. Yes.
25 registrants?	25 Q. Do you know if they have pictures?
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7 (Pages 25 to 28)

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 1   A. I don't know.
 2   Q. Gotcha. What about private background check results?
 3      Do you know if they have pictures?
 4           MR. DAMICH: Objection, lack of foundation.
 5           THE WITNESS: I don't know.
 6   BY MS. TILLMAN:
 7   Q. I'm sorry, I didn't hear your answer.
 8   A. Can I answer that.
 9   Q. Yes.
10   A. I don't know.
11   Q. Don't know, gotcha. And so, other information that
12      someone might find on the public registry includes
13      whether a registrant is compliant with SORA, correct?
14   A. Repeat that question, please.
15   Q. For sure. I can also rephrase it if it was a little
16      confusing.
17           I was asking does the public Sex Offender
18      Registry show whether or not a registrant is currently
19      compliant with SORA?
20   A. I want to say yes.
21   Q. For sure.
22   A. But I see it differently than what the public would
23      see it since I have administrative access.
24   Q. Gotcha. Can you explain what you mean by that.
25   A. I can see everything that's been entered on the
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 1      individual. If it's non-public, I can see it.
 2   Q. Gotcha.
 3   A. Whereas, the public may not be able to see it.
 4   Q. Gotcha. Understood. Do you know based on your
 5      experience with background checks whether or not
 6      someone might know or find out whether someone is
 7      compliant with their SORA requirements based on the
 8      background check?
 9           MR. DAMICH: Objection, lack of foundation.
10   BY MS. TILLMAN:
11   Q. You can answer if you know.
12   A. I don't know.
13   Q. Don't know, gotcha. And does the public Sex Offender
14      Registry website allow you to map a registrant?
15           MR. DAMICH: Objection, ambiguous.
16   BY MS. TILLMAN:
17   Q. Does it allow you to map a registrant's location based
18      on the information the registry has?
19   A. Location --
20   Q. Where they --
21   A. -- meaning, where they reside?
22   Q. Uh-huh, exactly. Where they reside or where they
23      work.
24   A. Yes.
25   Q. Do you know if a public background check can do the
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 1      same?
 2   A. I don't know.
 3   Q. Don't know, gotcha. And does the public Sex Offender
 4      Registry website show where a registrant is currently
 5      living?
 6   A. It shows where they last provided their resident
 7      address.
 8   Q. Do you know if the same is true of a background check?
 9           MR. DAMICH: Objection, lack of foundation.
10   BY MS. TILLMAN:
11   Q. You can answer if you know.
12   A. Yes.
13   Q. And the public registry, the public -- the public Sex
14      Offender Registry website also shows where a -- a
15      registrant is currently working if they have a job,
16      correct?
17   A. I believe so, yes.
18   Q. Do you know if the same is true for a background
19      check?
20           MR. DAMICH: Objection, lack of foundation.
21   BY MS. TILLMAN:
22   Q. You can answer if you know.
23   A. I don't know.
24   Q. Gotcha. And the public Sex Offender Registry website
25      allows the public to submit tips about registrants,
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 1      correct?
 2   A. Yes.
 3   Q. Do you know if there is any mechanism for background
 4      checks that are -- that performs the same type of
 5      function?
 6           MR. DAMICH: Objection, lack of foundation.
 7           THE WITNESS: I don't know.
 8   BY MS. TILLMAN:
 9   Q. Gotcha. Do you know if the registry is used as a
10      basis of excluding registrants from certain places or
11      activities?
12           MR. DAMICH: Objection, lack of foundation,
13      form.
14   BY MS. TILLMAN:
15   Q. You can answer if you know.
16   A. I don't know.
17   Q. Say, for example, is the registry used to bar people
18      with sex convictions from a gym or library, social
19      media, anything like that?
20   A. I don't know that.
21   Q. Don't know, gotcha. Do you know if the State of
22      Michigan has analyzed whether the registry has an
23      impact on whether a person will be convicted of
24      another sex offense?
25           MR. DAMICH: Objection, confusing,
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8 (Pages 29 to 32)

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1 compound, lack of foundation.	1 process goes down.
2 BY MS. TILLMAN:	2 So if someone is convicted of a sex offense
3 Q. You can answer if you know.	3 after pleading guilty, what happens next?
4 A. I don't know.	4 A. They would -- they're ordered to register, they would
5 Q. Do you know if the state plans to do some type of	5 register at a registering authority. That information
6 analysis about the impact on the -- the impact of the	6 would be entered and then sent to the SOR unit office.
7 registry?	7 Q. Gotcha. What happens if that individual is sentenced
8 MR. DAMICH: Objection, lack of foundation.	8 to prison?
9 BY MS. TILLMAN:	9 A. That information is entered through MDOC as the
10 Q. You can answer if you know.	10 registering authority.
11 A. I don't know.	11 Q. And are you familiar with the statute that governs the
12 Q. Gotcha. All right. So I'm just going to switch gears	12 Sex Offender Registry registration process, MCL
13 again a little bit. So are you familiar with the	13 28.724?
14 registration process for people with instate	14 A. I've reviewed it, yes.
15 convictions?	15 Q. Gotcha. And do you kind of know it off the top of
16 A. Yes.	16 your head? Or would it be better to pull it up?
17 Q. Can you provide just a general background of that	17 A. It would be better to pull it up.
18 process.	18 Q. So give me a second and I will share my screen really
19 A. I would refer to policy.	19 quickly. Can you see my screen?
20 Q. And which policy would you refer to?	20 A. I can now, yes.
21 A. Without having a list, I can't give you the number and	21 Q. Perfect. Are you looking at the 28.724 MCL?
22 the name.	22 A. Yes.
23 Q. Gotcha. So how about I just throw a scenario, because	23 Q. Perfect. Perfect. And so, MCL 28.724 lays out the
24 we're just trying to get basically just like the	24 registration process for an individual convicted of an
25 really basics of kind of just how the registration	25 offense registrable in Michigan, correct?
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1 A. Yes.	1 A. Yes.
2 MR. DAMICH: Objection, asks for a legal	2 Q. Perfect. Perfect. Just wanted to make sure we had
3 conclusion.	3 some clarity on that. Awesome.
4 BY MS. TILLMAN:	4 So when one of those entities registers an
5 Q. And it provides guidance on the entities responsible	5 individual, are they then creating a new record in the
6 for initial registration?	6 SOR database?
7 A. Yes.	7 MR. DAMICH: Objection, lack of foundation.
8 Q. So for an individual who is on probation for a listed	8 BY MS. TILLMAN:
9 offense, it's the individual's probation agent who	9 Q. You can answer if you know.
10 registers them?	10 A. Yes.
11 A. Yes.	11 Q. Gotcha. And so, that would mean a probation officer,
12 Q. And if they're on parole, it's the individual's parole	12 prison staff, or whatever entity is in charge of that
13 agent that registers them?	13 registration, they are creating that new record in the
14 A. Yes.	14 Michigan Sex Offender Registry database?
15 Q. And for an individual committed to jail for a listed	15 MR. DAMICH: Same objection.
16 offense, it's the sheriff or his or her designee that	16 BY MS. TILLMAN:
17 does the registration?	17 Q. You can answer if you know.
18 A. Yes.	18 A. Yes. But it's not finalized. It's not made public.
19 Q. And if they're under the jurisdiction of the	19 Q. Do you know how the record is created once they go
20 Department of Corrections at the time, then it's the	20 about doing that? Like what is the technical process?
21 DOC that handles that registration?	21 MR. DAMICH: Objection, lack of foundation.
22 A. Yes.	22 BY MS. TILLMAN:
23 Q. And if they're within the jurisdiction of the juvenile	23 Q. You can answer.
24 division or the Department of Social Services, it's	24 A. We follow policy.
25 one of those entities that handles the registration?	25 Q. Follow policy. And do you know which policy that is
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9 (Pages 33 to 36)

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1 specifically?	1 **A.** When the agency enters that information, it then comes
2 **A.** No, I don't know.	2 to an inbox where the SOR unit then reviews and
3 **Q.** Gotcha. Do you know the agencies that are doing the	3 follows policy.
4 registration decide what the tier level of the	4 **Q.** And is that like a shared inbox between the SOR unit?
5 individual would be?	5 **A.** Yes.
6 **A.** No.	6 **Q.** Gotcha. And what information comes to the SOR unit in
7 **Q.** Is it the SOR unit that does that?	7 that inbox?
8 MR. DAMICH: Objection, lack of foundation.	8 **A.** What the agency entered.
9 BY MS. TILLMAN:	9 **Q.** What would a -- what would an agency typically enter
10 **Q.** You can answer.	10 about a registrant?
11 **A.** The system tiers them based on the MCL.	11 **A.** The information provided to them, name, address, date
12 **Q.** Gotcha. And is the same true for whether or not the	12 of birth, driver's license number or state ID number,
13 registration will be public?	13 if it's MDOC, it might be an MDOC number.
14 **A.** Yes.	14 **Q.** Gotcha. Gotcha. And then what happens after the SOR
15 **Q.** Gotcha. Do you know at what point during the initial	15 unit gets that notification in that shared inbox?
16 registration process the SOR unit becomes aware of a	16 **A.** They review the information for accuracy.
17 potential registrant?	17 **Q.** And is the record then assigned to a specific analyst
18 MR. DAMICH: Objection, ambiguous.	18 or a technician within the unit?
19 MS. TILLMAN: I can rephrase the question	19 **A.** Yes.
20 if that's helpful.	20 **Q.** Gotcha. And is there a process for deciding who the
21 THE WITNESS: Yes.	21 record goes to?
22 BY MS. TILLMAN:	22 MR. DAMICH: Objection, I'm going to --
23 **Q.** Do you know at what point during the initial	23 we're delving into a process and internal operations
24 registration process does the SOR unit get the	24 of a state agency and its decision-making process.
25 information about the registrant?	25 MS. TILLMAN: Fair enough. I will -- I
Page 37	Page 38
1 will withdraw that question.	1 technician or analyst during their review might need
2 MR. DAMICH: Thanks.	2 more information in order to finish their review?
3 BY MS. TILLMAN:	3 **A.** Yes.
4 **Q.** After the record has been assigned to a specific	4 **Q.** And what information might they be missing?
5 analyst or technician, what do they do with the	5 MR. DAMICH: Objection, this is starting to
6 record?	6 delve into privileged information to decision-making
7 **A.** It starts out with the technician reviewing	7 process of a state agency. So I ask that she doesn't
8 information for accuracy and filling in the	8 go into this any further.
9 information that's required.	9 MS. TILLMAN: Question withdrawn.
10 **Q.** And then after they have -- would that result in a	10 MR. DAMICH: Thank you.
11 complete record at that point?	11 BY MS. TILLMAN:
12 **A.** No.	12 **Q.** And does the analyst or technician assign the tier
13 **Q.** Gotcha.	13 level during that process?
14 **A.** It goes to an analyst.	14 **A.** Can you rephrase that question.
15 **Q.** Gotcha. What --	15 **Q.** For sure. So during the process while the tech,
16 **A.** For another check.	16 analyst is reviewing the record, do they also assign a
17 **Q.** Gotcha. And then what happens after a record has been	17 tier level to that record?
18 through both the techs and the analyst?	18 **A.** It goes based on the MCL and if it's a juvenile case
19 **A.** If it's complete, it then becomes -- I don't want to	19 or -- there's a lot of things that are in factor.
20 say published, because it could be unpublished	20 **Q.** Gotcha. Would that record have a tier level assigned
21 depending on if it's a juvenile or what the case may	21 by the time it is finalized?
22 be. But they finalize that and based on the	22 **A.** Yes.
23 conviction or tier or -- that decides if it's public	23 **Q.** Gotcha. And for Michigan offenses, is the tier level
24 or not.	24 for specific offenses programmed into the MSOR
25 **Q.** Gotcha. Gotcha. Is there ever a case that a	25 database?
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10 (Pages 37 to 40)

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1 A. Yes.	1 A. Can you repeat that question.
2 Q. Gotcha. And so, if there was a new registrant who was	2 Q. Yeah, for sure. So during the review process while
3 convicted of CSC 3, the MSOR database would	3 the techs have the -- the techs have the record and
4 automatically code that person as a tier III perhaps?	4 then they send it to the analyst, during that process
5 A. It also looks at other factors. The court could list	5 at any point do the records go directly to you as the
6 them as a different tier. So all of that is played	6 manager?
7 into factor.	7 A. Not unless there's a question.
8 Q. Gotcha. What are those different factors that might	8 Q. Gotcha. So you wouldn't see every record that comes
9 affect that?	9 through the SOR unit?
10 A. The judge could order them as a lesser tier than what	10 A. No.
11 the MCL requires. That's just an example.	11 Q. Gotcha. And is there a particular point in that
12 Q. Uh-huh. Thank you for that. So same kind of	12 process that you might see it after the analyst, after
13 question, does the publication determination take	13 the tech, or after they have both reviewed it?
14 place during this review -- during this process of	14 MR. DAMICH: Objection, asked and answered.
15 reviewing the initial registration?	15 THE WITNESS: If they --
16 A. Yes.	16 BY MS. TILLMAN:
17 Q. Gotcha. And would those same type of factors kind of	17 Q. Sorry, I missed your answer.
18 factor into whether it be published or unpublished?	18 A. If they have a question.
19 A. Yes.	19 Q. And if they have a question, a record comes to you,
20 Q. Gotcha. And for Michigan offenses, is whether or not	20 what happens after the record goes to you?
21 the offense is public programmed already into the MSOR	21 A. I review it.
22 database?	22 Q. And what are you reviewing it for?
23 A. Yes.	23 A. I'm reviewing it based on their question.
24 Q. Gotcha. And at any point during the review process do	24 Q. And just since you have been at the SOR unit and since
25 the records go to you as the manager?	25 March 2023, how many times has a record come to you
Page 41	Page 42
1 for review?	1 Q. And -- gotcha. It looks like it has a revision date
2 A. Probably less than five.	2 for April 21st, 2022. Does that sound right to you?
3 Q. Gotcha. All right. I'm going to try to pull up an	3 A. Prior to me, yes.
4 exhibit. I'm going to attempt to share my screen	4 Q. Do you know if it was internally revised?
5 again. Give me one second. Can you see my screen?	5 A. I don't know.
6 A. Yes.	6 Q. Do you know what changes might have been made?
7 Q. So this is what we will mark as Exhibit A. It is	7 MR. DAMICH: Objection, lack of foundation.
8 Bates numbered 000 -- 0000774 through 776. It appears	8 BY MS. TILLMAN:
9 to be a SOR operating procedure. It has the label	9 Q. You can answer if you know the answer.
10 SOR-OP-307. Have you seen this before?	10 A. I don't know.
11 A. Yes.	11 Q. Gotcha. Do you know if it's been revised since April
12 MARKED BY THE REPORTER:	12 21st, 2022?
13 DEPOSITION EXHIBIT A	13 A. No, it has --
14 9:57 a.m.	14 Q. It hasn't -- it has not been revised. So this is the
15 BY MS. TILLMAN:	15 final version, as far as you know?
16 Q. And you're familiar with this document?	16 A. The final approved version.
17 A. Yes.	17 Q. The final approved version, gotcha. Is this an
18 Q. Can you just briefly describe what it is.	18 operating procedure that is used or referenced by the
19 A. It's the policy for registration.	19 SOR unit?
20 Q. Policy for registration. Do you know who wrote this	20 A. This is the policy.
21 document?	21 Q. Policy, gotcha. That is referenced by the SOR unit?
22 A. I do not.	22 A. Yes.
23 Q. Gotcha. Do you know who may have been involved in	23 Q. And does this policy provide guidance on initial
24 signing off on it?	24 registration processes for individuals with
25 A. Previous SOR manager.	25 registrable sex offenses?
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                                                    11 (Pages 41 to 44)

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1 **A.** Scroll down for me, please. This is just the policy.	1 individual, the date of birth matches. We have a
2 **Q.** What does this policy do? Or what is it for?	2 policy on that. And then it goes to an analyst.
3 **A.** It discusses record reviews, how the record is created	3 **Q.** Gotcha. Gotcha. And is this process the same for all
4 by the SOR unit, the tiering, if missing information.	4 record reviews for instate cases?
5 I mean, it -- you can read it like I can.	5 **A.** I believe so, yes.
6 **Q.** For sure.	6 **Q.** Do you know how long that review typically takes?
7 **A.** It lists all of those -- all of that information.	7 **A.** I do not know.
8 **Q.** And just looking at this, the section right here, I'm	8 **Q.** Gotcha. What happens if you don't have complete
9 going to briefly read what that says. So it says all	9 information for a record?
10 sex offender registration records shall be reviewed by	10 **A.** If it's required information, it's not published.
11 a Sex Offender Registry, SOR, unit staff member to	11 Nothing is finalized until that required information
12 ensure the accuracy and completeness of a record.	12 is entered.
13 Until the review is completed, the	13 **Q.** Gotcha. And are registrants notified once a record
14 individual's sex offender registration information	14 review is complete?
15 shall not be displayed on the Michigan public Sex	15 **A.** I don't know.
16 Offender Registry website or the national offender	16 **Q.** Gotcha. All right. So still looking at page one, but
17 public registry website. Do you see that?	17 this paragraph here, I'm going to again just quickly
18 **A.** Yes.	18 read that. So tiering when missing information. If
19 **Q.** Perfect. Can you break down what goes into a record	19 an offender has not been tiered because of missing
20 review before publication.	20 information or because it is an out-of-state
21 **A.** What goes into the record review?	21 conviction, the SOR unit will locate the missing
22 **Q.** Uh-huh.	22 information to properly tier the registrant.
23 **A.** It goes to a tech. The tech reviews the record, will	23 After all efforts have been exhausted, the
24 make sure it's accurate compared to MDOC information	24 following applies; one, for a Michigan offense, where
25 or criminal history, make sure it's the right	25 the victim age cannot be determined, the offender will
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1 be a tier II and must register for twenty-five years.	1 here in the tiering when missing information, it's
2 Two, for out-of-state convictions, the offender will	2 possible that a registrant could have committed a tier
3 be a tier II and must register for twenty-five years	3 III offense but be registered as a tier II offender on
4 or the duration required of the other state, whichever	4 the Sex Offender Registry, correct?
5 is longer. Do you see that?	5 **A.** It's possible.
6 **A.** Yes.	6 **Q.** Gotcha. And so, similarly, a registrant could have
7 **Q.** Perfect. Do you know how the SOR unit locates missing	7 committed a tier I offense but be registered as a tier
8 information?	8 II?
9 **A.** Yes.	9 **A.** It's possible.
10 **Q.** And how do they do that?	10 **Q.** And that would mean that instead of registering for
11 **A.** They run different systems, criminal history, Omni --	11 ten years, they might be -- or they might be subject
12 well, whatever their system is called for MDOC.	12 to registration for twenty-five years because of that
13 They'll ask if -- if that individual was in prison.	13 missing information?
14 They might have to reach out to the agent that entered	14 **A.** It's possible.
15 them for further information or clarifying	15 **Q.** Gotcha. To your knowledge, does the SOR unit
16 information.	16 generally continue to search for missing information
17 **Q.** Gotcha. And the missing information that we're kind	17 after making that tier and duration determination?
18 of referring to, that would be helpful in accurately	18 **A.** We exhaust all avenues before we make that tier.
19 classifying the tier and duration of a registrant?	19 **Q.** Gotcha. Has it ever been -- to your knowledge, has it
20 **A.** Yes.	20 ever been your experience that missing information did
21 **Q.** Gotcha. So under this guidance, a registrant could	21 come in after that tier and duration determination was
22 potentially have committed a tier III offense but be	22 made?
23 registered as a tier II on the SOR?	23 **A.** I don't know.
24 **A.** Say that again. Can you repeat that.	24 **Q.** Gotcha. All right. I'm going to stop sharing with my
25 **Q.** Yeah, no problem. So just based on what's provided	25 screen. All right. Just going to switch gears again
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12 (Pages 45 to 48)

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1   to a couple of questions I have about the process for
2   out-of-state registration.
3   Are you familiar with the process for
4   registering out-of-state individuals?
5   A. I've reviewed policy, yes.
6   Q. And is the process for registering out-of-state
7   offenders different from that for instate offenders as
8   described above -- or described previously, more so?
9   A. You'd have to refer to the policy.
10   Q. What --
11   A. More in-depth.
12   Q. For sure. What policy would that be?
13   A. I don't know the number.
14   Q. Gotcha. Would you be able to provide a general
15   breakdown of how you process registration for
16   out-of-state offenders?
17   A. You'd have to review the policy.
18   Q. So you can't do a general breakdown?
19   A. No.
20   Q. Gotcha. We don't know off the top of our head which
21   policy that would be?
22   A. I don't know.
23   Q. So previously the SOR unit inhouse legal advisor
24   testified that part of the process the SOR unit uses
25   in determining registration requirements for

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1   out-of-state offenders is to determine if their
2   conviction from the other jurisdiction is
3   substantially similar to a registrable Michigan
4   offense. Is that also your understanding?
5   MR. DAMICH: Objection, lack of foundation.
6   THE WITNESS: Yes.
7   BY MS. TILLMAN:
8   Q. Was that a yes?
9   A. Yes.
10   Q. And the second part of that process, according to the
11   testimony, is determining the registration
12   requirements the convicting state imposes on the
13   registrant. Is that also your understanding?
14   MR. DAMICH: Same objection.
15   BY MS. TILLMAN:
16   Q. You can answer if you know.
17   A. Yes.
18   Q. Do you know if the SOR unit has a specific process for
19   determining if an out-of-state offense is
20   substantially similar to a Michigan one?
21   A. Yes.
22   Q. What is that process?
23   A. Refer to the policy.
24   Q. Which policy is that?
25   A. I don't know the number.

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1   Q. Gotcha. Have you ever needed to make a determination
2   of whether an out-of-state offense was substantially
3   similar to a Michigan one?
4   A. I have not, no.
5   Q. Gotcha. Do you know if the SOR unit generally keeps
6   track of determinations that they make about whether
7   an out-of-state offense is substantially similar to a
8   Michigan one?
9   A. Yes.
10   Q. And how do they usually keep track of that
11   information?
12   A. They have a table.
13   Q. Table. Would that be the PACC code table that you
14   mentioned earlier?
15   A. Yes, ma'am.
16   Q. Gotcha. So I -- I would like to go through the --
17   just a couple of examples with you, just to see --
18   just to get a better understanding of how the
19   registration for out-of-state individuals might work.
20   So, for example, one of the plaintiffs in
21   this case, Mary Doe, was convicted of Ohio RC 2907.04
22   and has been classified as a tier III registrant. We
23   haven't been able to figure out what offense the
24   Michigan State Police thinks is substantially similar
25   to the Ohio offense that would make her tier III.

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1   So is it recorded anywhere what the MSP
2   determined is the substantially similar to the
3   Michigan offense to that one?
4   A. I don't know.
5   MR. DAMICH: Objection, form.
6   MS. TILLMAN: Sorry, I heard you both at
7   the same time.
8   MR. DAMICH: Objection to the form.
9   MS. TILLMAN: Gotcha.
10   BY MS. TILLMAN:
11   Q. What was your answer?
12   A. That was before my time, I don't know.
13   Q. Gotcha. How would you figure out why the MSP
14   classified her as a tier III?
15   A. How would I figure out?
16   Q. Uh-huh.
17   A. I would have to look at the entire case and I would
18   review with legal.
19   Q. Gotcha. Do you know if anyone at MSP has reviewed her
20   tier classification since this lawsuit was filed?
21   A. I don't know.
22   Q. Don't know, gotcha. All right. I'm going to attempt
23   to share my screen again. So far so good, so
24   hopefully it stays that way. All right. Can you see
25   that?

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13 (Pages 49 to 52)

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1 A. I can see it, but it's very small.	1 tier level to Michigan.
2 Q. I figured that might be the case. How about that?	2 Q. Perfect. Perfect. So does this chart show
3 A. Yes, much better.	3 non-Michigan offenses that have been found to be
4 Q. Perfect. Perfect. So this is what we'll mark as	4 substantially similar to a Michigan registrable
5 Exhibit B. It's Bates stamp 0000722 on the form,	5 offense?
6 which I'm happy to share as need be. It appears to be	6 A. Can you repeat that question, please.
7 a chart of out-of-state offenses. Have you seen this	7 Q. For sure. So does this -- is this chart showing
8 chart before?	8 non-Michigan offenses that have been found to be
9 A. Yes.	9 substantially similar to a Michigan registrable
10 MARKED BY THE REPORTER:	10 offense?
11 DEPOSITION EXHIBIT B	11 A. Yes.
12 10:11 a.m.	12 Q. Gotcha. And does it show offenses that are not
13 BY MS. TILLMAN:	13 substantially similar to Michigan offenses but that
14 Q. Perfect. Can you just briefly explain what it is.	14 require registration in another convicting state?
15 A. This is a cheat sheet based on state PACC code	15 A. I don't know.
16 description, tier level, some other notes.	16 Q. Gotcha. Is it accurate to describe this as a chart
17 Q. Gotcha. And is this PACC code chart used in the SOR	17 that shows non-Michigan offenses that have been
18 unit?	18 determined in the past to potentially require
19 A. Yes.	19 registration in Michigan?
20 Q. And do you know who in the SOR unit uses it?	20 A. Yes.
21 A. The staff.	21 Q. And do you know how long this chart has been in use?
22 Q. And do you know when the staff started using it?	22 A. I do not know.
23 A. I don't know.	23 Q. Gotcha. Do you have -- do you happen to know when it
24 Q. Gotcha. Do you know what it's used for?	24 was originally created?
25 A. Reviewing out-of-state PACC codes and what comparable	25 A. I do not know.
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1 Q. Do you happen to know who created it?	1 A. I do not know.
2 A. I do not know.	2 Q. Don't know, gotcha. Are the -- do you know if the
3 Q. Gotcha. And do you happen to know why it was created?	3 non-Michigan offenses on the second tab -- I can go in
4 A. I do not know.	4 there and zoom in -- do you know if the Michigan
5 Q. For sure. And do you know if it has been updated	5 offenses listed here were classified after July 16th,
6 since it was originally created?	6 2021?
7 A. I do not know.	7 A. I don't know.
8 Q. For sure. And can you see where my cursor is right	8 Q. Don't know, gotcha. Do you know if the -- the
9 now?	9 non-Michigan offenses in this first tab were
10 A. Yes, ma'am.	10 classified before July 16th, 2021?
11 Q. Can you see these four tabs at the bottom?	11 A. I don't know.
12 A. Yes, but they're very small.	12 Q. Don't know, gotcha. So if I scroll down all the way
13 Q. They are. They are very small. I'm not entirely sure	13 to the bottom of this sheet -- I think I can do that a
14 I can do anything about that. Let's see, maybe not, I	14 little faster than that -- without counting the
15 can read them for the record.	15 header, it looks like there are about two thousand,
16 So the first tab says PACC code table. The	16 two hundred and seven non-Michigan offenses that have
17 second tab says added after 07/16/2021. And then tab	17 been found to be substantially similar to a Michigan
18 three says sheet two and then sheet three. Is that a	18 offense. Do you see that?
19 fair representation of what we're looking at?	19 A. I see that, yes.
20 A. Yes.	20 Q. And on the second tab, same thing, about fifty-two
21 Q. Have you ever looked at these other sheets?	21 non-Michigan offenses, not counting for the header.
22 A. I have looked at the second tab, added after.	22 Do you see that?
23 Q. Gotcha. Gotcha. And so, do you know what is	23 A. Yes, for out of state, uh-huh.
24 different about the second tab than this first tab	24 Q. And it looks like it has a date of 6/29 -- this
25 that we're looking at?	25 table -- it looks like it has a date of 6/29/2022 --
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14 (Pages 53 to 56)

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1 and I just closed it. There we go. It looks like	1 **A.** Yes.
2 6/29/2022. Did you see that in the title?	2 **Q.** Perfect. And in column B, that's the statutory
3 **A.** I do see that, yes.	3 citation for the conviction?
4 **Q.** Is it fair to assume the table includes information at	4 **A.** Yes.
5 least through that date?	5 **Q.** And then this column, this is just the offense name?
6 **A.** I would assume so.	6 **A.** Yes.
7 **Q.** Gotcha. So as of when this chart was produced to us,	7 **Q.** And then this column says CRR. Do you know what that
8 two thousand, two hundred and fifty-nine offenses have	8 acronym stands for?
9 been classified as substantially similar to a Michigan	9 **A.** I do not.
10 registrable offense, correct?	10 **Q.** Gotcha. Do you know what the different numbers in the
11 **A.** If your math is correct.	11 field might stand for?
12 **Q.** For sure. And do you know if that number has changed	12 **A.** I do not.
13 since 2022?	13 **Q.** Gotcha. And then columns E through L, the ones I just
14 **A.** I do not know.	14 unhid, they are each represented by about three --
15 **Q.** Gotcha. And would you happen to know how many are	15 two- to three-letter acronyms. Do you know what any
16 classified totally as of today?	16 of them stand for?
17 **A.** I do not know.	17 **A.** I do not.
18 **Q.** Gotcha. Okay. So I do want to just kind of walk down	18 **Q.** Do you know what it means if one of these fields is
19 this table a bit, just to get a better understanding	19 blank?
20 of some of the information on it. But I do think I	20 **A.** I do not.
21 need to unhide some of the columns first to do that.	21 **Q.** Gotcha. And then column M here, it's listed as --
22 Like I said, I want to get a better understanding of	22 it's labelled as non-listed. Do you know what that
23 what -- kind of what everything means on this chart.	23 means?
24 So in column A, here, this is the	24 **A.** I do not.
25 convicting jurisdiction, correct?	25 **Q.** Do you know what the different letters in this field
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1 might mean?	1 **A.** I don't know.
2 **A.** I'm assuming N means no.	2 **Q.** Do you know what it means if something's left blank?
3 **Q.** And Y might mean yes?	3 **A.** I do not know.
4 **A.** I would assume that, yes.	4 **Q.** Gotcha. And then column Q -- actually column P,
5 **Q.** And column N is called tier level. Do you know what	5 excuse me, says victim age begin. Do you know what
6 that means?	6 that means?
7 **A.** It would be the tier level of that PACC.	7 **A.** I'm assuming that's the victim age.
8 **Q.** So that's the Michigan tier level that has been	8 **Q.** Gotcha. Do you know what it might mean if the column
9 assigned to that out-of-state offense?	9 is blank?
10 **A.** I don't know.	10 **A.** I do not know.
11 **Q.** So do -- does this column correspond to the different	11 **Q.** Gotcha. And column Q kind of similarly says victim
12 -- the different rows in these columns?	12 age end. Do you know what that means?
13 **A.** Yes.	13 **A.** I would assume it would be the ending age of that PACC
14 **Q.** Gotcha. So for example, Massachusetts 272-16 has been	14 code.
15 coded as a tier I, is that right?	15 **Q.** And do you know what it means if it's blank?
16 **A.** That's what I would assume, yes.	16 **A.** I do not know.
17 **Q.** Gotcha. And what does it mean if a tier is left	17 **Q.** Do you know if victim age is used to determine
18 blank?	18 whether -- what the tier level should be for some
19 **A.** I don't know.	19 out-of-state offenses?
20 **Q.** Do you know if the SOR unit would need to get	20 **A.** I believe so, yes.
21 additional information to populate that tier?	21 **Q.** Gotcha. And is victim age also used to determine what
22 **A.** I don't know.	22 offense is substantially similar in the first place?
23 **Q.** Gotcha. All right. So then moving on to column O,	23 **A.** I don't know.
24 this says published single offense. Do you know what	24 **Q.** Gotcha. Then column R says approved by MSP legal. Do
25 that means?	25 you know what that means?
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15 (Pages 57 to 60)

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1 **A.** Yes.	1 **A.** Any additional notes that the analyst's reviewing or
2 **Q.** And what does that mean?	2 may need that doesn't fit the category before.
3 **A.** If it's went to legal for review.	3 **Q.** And then going back to our first table, column S says
4 **Q.** Gotcha. Went to legal for review. And so, when I	4 comparable Michigan code. Do you know what that
5 sort this column, it looks like I get about eighteen	5 column is used for?
6 cases that show as approved by legal. Do you see	6 **A.** Can you scroll over. I can't see that.
7 that?	7 **Q.** Yeah, for sure. Is that better?
8 **A.** I do.	8 **A.** Yes. That would be the Michigan code that's
9 **Q.** Perfect. Do you know what that means?	9 comparable to that out-of-state offense.
10 **A.** I'm assuming legal reviewed those.	10 **Q.** Gotcha. So that is -- that is supposed to show --
11 **Q.** Gotcha. And then going to the second tab, it looks	11 that is supposed to show the Michigan offense that is
12 like there are zero cases where the -- there's	12 substantially similar to the out-of-state offense
13 something in the approved by MSP legal. Do you see	13 coded on the left here?
14 that?	14 **A.** That's my understanding, yes.
15 **A.** I do.	15 **Q.** Do you know who inputs that information into this
16 **Q.** What does that mean when there's no entry at all?	16 column, into column S?
17 **A.** I don't know.	17 **A.** One of the SOR unit staff members.
18 **Q.** And are there circumstances where a notation might be	18 **Q.** And so, just doing the sorting thing again, it looks
19 made?	19 like when I sort this column, I get about forty-two --
20 **A.** A notation?	20 forty-one or forty-two -- about -- about forty-one or
21 **Q.** On the record.	21 forty-two rows where it says the comparable Michigan
22 **A.** If you look -- scroll up, I believe there's a notes on	22 offense is listed. Do you see that?
23 the far right.	23 **A.** I do.
24 **Q.** There we go. And what kind of notes might be added to	24 **Q.** Perfect. Perfect. And when I sort on the second tab,
25 this field?	25 doing the same thing, it looks like I get one. Do you
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1 see that?	1 **Q.** Gotcha. Are you -- actually, I withdraw that last
2 **A.** One? I thought I saw one on the lower left when you	2 question I was about to ask.
3 sort the -- no, it's one.	3 If an attorney contacts the SOR unit and
4 **Q.** Okay. Perfect. So out of the two thousand, two	4 says my client was convicted of murder under -- let's
5 hundred and fifty-seven offenses that we talked about	5 say -- let's use one of these for example. We've got
6 earlier, about forty-two, forty-three show a	6 -- actually, I'm on the wrong sheet. That explains a
7 comparable Michigan offense code, is that correct?	7 lot.
8 **A.** That would be my assumption, yes.	8 So we've got Arizona code 13-14 -- so if an
9 **Q.** And do you know what it means when the comparable	9 attorney were to contact the SOR unit and say that my
10 Michigan code column is blank?	10 client was convicted under this particular statute,
11 **A.** I do not.	11 Arizona 13-1406.1 of sexual assault of a spouse and
12 **Q.** Gotcha. Do you know if this chart includes offenses	12 wants to know what the MSP thinks the substantially
13 that are not comparable to Michigan offenses but	13 similar offense is, what would the SOR unit need to
14 require registration in the state of conviction?	14 answer that question?
15 **A.** I don't know that.	15 **A.** Well, we would look at this and it's -- if you scroll
16 **Q.** Don't know. And do you know why that information	16 to the right, I believe it's blank. So we would
17 might be excluded from this chart?	17 consult our legal.
18 **A.** I have no idea.	18 **Q.** Gotcha. Still using this chart, but different kind of
19 **Q.** Gotcha. And do you know if the SOR unit keeps	19 train of questions. Do you know if this chart is
20 information elsewhere about what comparable Michigan	20 integrated or interfaced at all with the MSOR
21 code is for out-of-state offenses?	21 database?
22 **A.** I am -- I don't know.	22 **A.** I don't believe it is.
23 **Q.** Do you know of any other cheat sheets or charts kind	23 **Q.** Don't believe it is, gotcha. We previously heard some
24 of similar to this one?	24 testimony that the table is able to populate tier
25 **A.** No, ma'am.	25 levels in the MSOR database. Is that different from
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16 (Pages 61 to 64)

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1   your understanding of how the chart is used?
2   MR. DAMICH: Objection, lack of foundation.
3   BY MS. TILLMAN:
4   Q. You can answer if you know.
5   A. I don't know.
6   Q. Do you know if the information in this chart is ever
7   used to automatically determine the tier level or
8   duration for a registrant in the MSOR database?
9   A. I believe it is used to confirm or ensure that the
10   proper tier is made.
11   Q. Gotcha. But that would -- that process would be more
12   manual. So someone would look at this chart, kind of
13   confer with it, and then make that determination and
14   then manually enter that information into the
15   database, it doesn't auto-populate it?
16   A. MSOR and this don't talk together, if that's what
17   you're asking.
18   Q. Gotcha. So they do not talk, gotcha. When new
19   out-of-state offenses are classified, do you know if
20   those offenses are added to the PACC code chart?
21   A. I -- can you repeat that question.
22   Q. So if a new out-of-state offense is classified and
23   it's not already in this chart, do you know if that
24   offense is then added to the PACC code chart?
25   A. It is updated, yes.

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1   Q. And how far after kind of coming into contact with
2   that new offense is it added to the chart?
3   A. I don't know that.
4   Q. Gotcha. Do you know who adds them?
5   A. One of my analysts does.
6   Q. Gotcha. So once the SOR unit staff start inputting a
7   person into the MSOR database, do you know if there
8   are circumstances where the database might
9   automatically tier a -- or automatically assign a tier
10   and duration for a registrant?
11   A. Based on PACC code.
12   Q. Are there circumstances where that wouldn't happen?
13   Where a tier or duration would not be automatically
14   assigned?
15   A. I don't know that.
16   Q. And to your understanding, does this mean that if a
17   SOR staff member enters an out-of-state offense that
18   is already listed on the PACC chart, when that -- when
19   that registrant or that MCL code is then entered into
20   the MSOR database, the database will automatically
21   assign a tier and duration based on the information
22   that was coded into this chart?
23   A. I don't know.
24   Q. Gotcha.
25   A. I'm not familiar with that.

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1   Q. Do you know if there are offenses listed in this table
2   where the tier level is blank?
3   A. I'm looking at several right now, yes.
4   Q. And what happens when SOR staff enter an offense into
5   the MSOR database where the tier level is blank on the
6   chart -- on the PACC chart?
7   A. I don't know. We usually refer to legal if we have
8   any questions.
9   Q. Gotcha. Do you know if some classifications depend on
10   victim's age?
11   A. I believe so, yes.
12   Q. Do you know what happens if tiering an offense depends
13   on victim age?
14   A. The offense -- the tier could be different based on
15   the age of the victim.
16   Q. Do you know if the SOR unit staff do the work to
17   determine the victim age?
18   A. What do you mean by that?
19   Q. Like do -- is that information that the SOR unit staff
20   have to go find or ask for? Or is that information
21   that you generally already have?
22   A. If we do not have it and it's needed, then, yes, we --
23   we do everything we can to find that information.
24   Q. Gotcha. And once the SOR unit is able to determine
25   the age of the victim, do they enter that into the

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1   MSOR database?
2   A. I believe there's a field, yes.
3   Q. And after that field has been populated, would the
4   system then assign a tier?
5   A. I believe so, yes.
6   Q. Gotcha. And does anything else have to happen for
7   that process to take place?
8   A. The policy and procedure is followed.
9   Q. And do you know if those cases are ever sent to legal
10   before they are published?
11   A. Some cases are, yes.
12   Q. Gotcha. And what cases would those be -- or in what
13   circumstances would they be sent to legal?
14   A. If there's any question. If we are unsure of the
15   proper tier or if the PACC code, in this case, from
16   another state is comparable to a Michigan one. If we
17   have any question, we send it to legal.
18   Q. Gotcha. And do you know what happens when a
19   technician enters an offense where the published field
20   is marked yes on the PACC chart?
21   A. When a technician enters an offense?
22   Q. So if a technician is entering an offense code or --
23   yeah, an offense code in the MSOR database, but in the
24   PACC chart for that MC -- or for that PACC code, the
25   publish field is marked blank or not -- excuse me, let

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                                          17 (Pages 65 to 68)

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1 me rephrase that question.	1 **A.** If there is any question, yes.

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 1     me rephrase that question.
 2            When a technician is entering an offense in
 3     the MSOR database and the PACC code chart that -- or
 4     that statute is marked with a yes under the publish
 5     field, do you know what happens in the database?
 6     A.  I don't know.
 7     Q.  Do you know if the system would code the person as
 8         being on the public registry?
 9     A.  I don't know.
10     Q.  Do you know what happens if the publish field is just
11         blank at all?
12     A.  I don't know.
13     Q.  Gotcha.  When tier levels are automatically assigned,
14         are there other steps that need to take place before
15         publication?
16     A.  We follow policy and procedure.
17     Q.  And which policy and procedure would that be?
18     A.  I don't know the number.
19     Q.  Is there any review process involved in that
20         procedure?
21     A.  Yes.
22     Q.  Gotcha.  And are you involved in the review process?
23     A.  Yes.
24     Q.  Gotcha.  And would there be circumstances where that
25         record might be sent to legal?
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 1     A.  If there is any question, yes.
 2     Q.  And just to kind of make sure I'm understanding kind
 3         of the full breadth of this chart, so based on your
 4         understanding, where the tier level is listed on the
 5         PACC chart, the MSOR database might automatically code
 6         the person according to the tier as it relates to the
 7         out-of-state conviction, is that right?
 8     A.  I don't know that.
 9     Q.  And in situations where a case is not further reviewed
10         because the decision was already made in the past
11         about the non-Michigan offense, would that
12         automatically tier in the MSOR database?
13     A.  Based on the --
14     Q.  Based on the --
15     A.  -- based on the PACC code Michigan offense, like
16         Michigan offense, yes.
17     Q.  Gotcha.  Perfect.  And if -- if an offense is
18         automatically tiered based on this PACC code chart,
19         would it require any further review unless there were
20         questions?
21     A.  Yes.  It's always double-checked.
22     Q.  Double-checked, gotcha.  And where the tier level is
23         not listed on the PACC code chart, that generally
24         means further information might be needed to make a
25         determination about tier and duration?
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 1     A.  Yes.
 2     Q.  Gotcha.  Perfect.  So again, I want to just explore a
 3         couple of examples just listed on this chart about how
 4         someone might process the information that's provided
 5         on this chart.
 6            So looking at AK, so an Arkansas offense,
 7         11.41.458.  So this is a conviction for Arkansas
 8         11.41.458, which is indecent exposure in the first
 9         degree.  Do you know if this offense is listed because
10         it is substantially similar to a Michigan offense?  Or
11         because the individual would have had to register
12         under Arkansas law?
13            MR. DAMICH:  Objection, lack of foundation.
14     BY MS. TILLMAN:
15     Q.  If you know.
16     A.  I don't know.
17     Q.  So the PACC code chart does not list it at -- or does
18         not list a comparable Michigan code or a substantially
19         similar offense.  Do you see that?
20     A.  I can't see that, no.
21     Q.  Let me scroll over.  Can you see that now?
22     A.  Yes.
23     Q.  Perfect.  Do you know offhand what might be a
24         substantially similar offense to this Arkansas
25         offense?
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 1     A.  No, I don't.
 2            MR. DAMICH:  Objection, lack of foundation.
 3     BY MS. TILLMAN:
 4     Q.  And the chart does list this offense as a tier I
 5         offense, correct?
 6     A.  Yes.
 7     Q.  So if someone from the SOR unit enters a person with
 8         this Arkansas conviction for indecent exposure in the
 9         first degree, does the SOR database automatically
10         assign that person as tier I?
11     A.  I don't know.
12     Q.  Gotcha.  If the MSOR database does do automatic
13         assignments, is that handled at the level of the SOR
14         unit technicians?
15     A.  I believe it's at the analyst, but I.
16     Q.  Analyst.  Okay.  And then just to use another example,
17         so this is Arkansas 11.41.460 for indecent exposure in
18         the second degree.  Do you see that?
19     A.  Yes.
20     Q.  And here the PACC code table does not assign a tier
21         level.  Do you see that?
22     A.  Yes.
23     Q.  It also doesn't show a substantially similar or
24         comparable Michigan offense, right?
25     A.  Correct.
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18 (Pages 69 to 72)

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1 Q. Do you know offhand what offense MSP might consider to 2 be substantially similar? 3 A. No, I do not. 4 Q. What would happen if a person with the Arkansas 5 indecent exposure in the second degree came to 6 Michigan? 7 A. We would look at that PACC code and the law for 8 Arkansas and review Michigan law for a comparable. If 9 we do not know, we send to legal. 10 Q. Gotcha. Is there particular information or specific 11 information that you would need in order to determine 12 the registration requirements for this individual? 13 A. We would need to know what Arkansas' requirements are. 14 Q. And do you know who ultimately makes the decision or 15 determination of what the registration requirements 16 might be? 17 A. The analyst recommends and then we send to legal if we 18 have any question. 19 Q. Gotcha. If a tier doesn't automatically populate from 20 based on the PACC chart, do you know how a tier might 21 be assigned? 22 A. I do not know. 23 Q. And same question for publication status; if it 24 doesn't automatically populate, do you know how it 25 might be decided? Page 73	1 A. I do not know. 2 Q. Gotcha. 3 A. I'm assuming it's in policy. 4 Q. For sure. And are -- are there instances where you 5 might need additional information to assign the tier? 6 A. Yes. 7 Q. And is that additional information reviewed if 8 received? 9 A. Yes. 10 Q. And is that information reviewed by the same analyst 11 who was doing the initial record review? Or would it 12 go on to a different analyst or technician? 13 A. It starts with a technician. It goes to the analyst. 14 The analyst further -- has further questions, he or 15 she may consult with another analyst. 16 Q. Gotcha. And then Alabama 13A-6-20, there we go. So 17 this is the Alabama statute 13A-6-20, which is assault 18 in the first degree. So based on the PACC table here, 19 it looks like the tier level is determined by the age 20 of the victim? 21 A. That's what I would assume, yes. 22 Q. So if the SOR unit staff enters a person with this 23 conviction, what would happen? 24 A. I don't know. I assume that it would be entered as 25 what it shows here. I don't know if it does it Page 74
1 automatically or not. 2 Q. Gotcha. Would the SOR unit staff member need to get 3 the victim age information to make this classification 4 accurately? 5 A. It appears so, yes. 6 Q. So let's say the technician was able to get police 7 reports from the convicting state and the reports say 8 the victim was seventeen years old, what happens next? 9 A. It would go to an analyst for review. 10 Q. Gotcha. If that age information is inputted then into 11 the MSOR database, would the database then assign that 12 person to tier II? 13 A. I don't know if it does with the out-of-state ones. 14 Q. Gotcha. Do you know if this out-of-state conviction 15 specifically is listed because it's considered 16 substantially similar to a Michigan offense? Or 17 because it requires registration in Alabama? 18 A. I don't know. 19 Q. Don't know, gotcha. As we can see here it -- there is 20 no comparable Michigan code or substantially similar 21 offense listed here, correct? 22 A. I can't see that. 23 Q. Let me scroll over. How about now? 24 A. Correct. 25 Q. And do you know offhand what offense might be Page 75	1 substantially similar? 2 A. I do not know. 3 Q. Gotcha. And it looks like -- my understanding at 4 least based on this chart -- is that this is listed to 5 automatically tier the person, is that correct? 6 A. I don't know. 7 Q. Gotcha. 8 MR. DAMICH: Dayja, do you mind if we take 9 like a five- or ten-minute break? 10 MS. TILLMAN: Yeah, no, that's perfectly 11 fine. 12 (Off the record 10:46 a.m.) 13 (Back on the record at 11:00 a.m.) 14 BY MS. TILLMAN: 15 Q. I'm going to briefly re-share my screen with the PACC 16 chart. And can you still see that? 17 A. Yes. 18 Q. Perfect. I want to go through one more example from 19 this chart just to make sure I understand how it 20 works. Okay. 21 So this is Georgia 16-6-2 for sodomy. The 22 PACC code table shows this results in a tier III 23 publication. Do you see that? 24 A. Yes. 25 Q. Did you see that, more so. Okay. Page 76

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1   Do you know if this is programmed into the
2   MSOR database to automatically tier a person with a
3   Georgia sodomy conviction as a tier III?
4   A. I don't know.
5   MR. DAMICH: Objection, lack of foundation.
6   BY MS. TILLMAN:
7   Q. And do you know if that -- do you know if the offense
8   is listed in this chart because it's substantially
9   similar to a Michigan offense? Or because you have to
10   register in Georgia?
11   MR. DAMICH: Same objection.
12   THE WITNESS: I don't know.
13   MR. DAMICH: Objection, lack of foundation.
14   BY MS. TILLMAN:
15   Q. And there is no comparable Michigan code listed here.
16   Do you see that?
17   A. Correct.
18   Q. Do you know what would be the comparable Michigan
19   offense off the top of your head?
20   A. I don't.
21   MR. DAMICH: Objection, lack of foundation.
22   BY MS. TILLMAN:
23   Q. And in Michigan sodomy is only registrable if against
24   a minor, correct?
25   A. I'd have to review to statute.

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1   Q. Sure. And certain consensual sodomy with underage
2   teens is not registrable if less than a four-year age
3   difference, correct?
4   MR. DAMICH: Objection, form.
5   BY MS. TILLMAN:
6   Q. You can answer if you know.
7   A. I don't know.
8   Q. And the PACC chart doesn't list a victim age in this
9   line, right, for this conviction?
10   A. It's empty, correct.
11   Q. So if the PACC table was used to program the system,
12   then the MSOR database would automatically assign a
13   person with a Georgia sodomy conviction to tier III,
14   lifetime public registration, even if the offense was
15   against an adult, correct?
16   MR. DAMICH: Objection, form, ambiguous,
17   lack of foundation, confusing. You can answer.
18   THE WITNESS: I don't understand the
19   question.
20   BY MS. TILLMAN:
21   Q. I can rephrase. So because the PACC chart codes a
22   sodomy offense from Georgia as tier III, if the
23   MSOR -- the MSOR database would automatically assign a
24   person with a Georgia sodomy conviction to tier III,
25   even if the offense was against an adult because there

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1   is victim age missing, correct?
2   MR. DAMICH: Same objection.
3   THE WITNESS: I don't know.
4   BY MS. TILLMAN:
5   Q. And what if the offense involved sexual activity
6   between teenagers, one of whom was old enough to
7   consent, it would still list them as a tier III
8   registrant, correct?
9   A. I don't know.
10   Q. But based on what this chart is showing, is that a
11   fair assumption?
12   MR. DAMICH: Objection, form.
13   BY MS. TILLMAN:
14   Q. You can answer if you can.
15   A. Based on what the chart is showing. It's not implying
16   it's automatically entered that way in MSOR.
17   Q. Gotcha. And then I'm going to stop sharing this
18   chart. There we go. All right.
19   So let's say there's an offense on the PACC
20   chart and that offense has been populated into the
21   MSOR database, are there circumstances where you might
22   still confer with legal to determine registration
23   requirements anyway?
24   A. If there are further questions, yes.
25   Q. Gotcha. What kind of questions might come up?

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1   A. Maybe the court order is different or we want to
2   confirm something. If there's any question or doubt,
3   then it is referred to legal.
4   Q. Gotcha. All right. And I'm going to share a
5   different screen. Can you see this?
6   A. Yes.
7   Q. Perfect. So this is what we will mark as Exhibit C.
8   This is Bates number 0000723 through 724. Have you
9   seen this before?
10   A. I have.
11   MARKED BY THE REPORTER:
12   DEPOSITION EXHIBIT C
13   11:05 a.m.
14   BY MS. TILLMAN:
15   Q. And you're familiar with this document?
16   A. Yes.
17   Q. And can you briefly describe what it is.
18   A. It's the steps in which out of state is figured for
19   adult and juvenile.
20   Q. Have you ever used this chart?
21   A. I have not personally, no.
22   Q. Do you know if your staff in the SOR unit has used
23   this chart before?
24   A. Yes.
25   Q. And why might they use this chart?

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20 (Pages 77 to 80)

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1 A. Somebody is coming from out of state.	1 Q. Gotcha. And so, at the bottom of this flowchart, it
2 Q. Someone is coming from out of state and they use the	2 looks like it's on both pages, it says if the crime
3 chart to help determine their registration	3 code is not listed or tiered in the PACC code table,
4 requirements?	4 consult with an analyst before moving to the next
5 A. Yes.	5 step. Do you see that?
6 Q. Gotcha. So if an offense is already listed on the	6 A. Yes.
7 PACC chart, which we already talked about, do you know	7 Q. And do you know what this means?
8 if a technician or analyst would need to go through	8 A. It would be referring to an analyst to confirm the
9 the process on the flowchart to figure out a -- or to	9 tier.
10 make a classification?	10 Q. When would a technician in the SOR unit consult with
11 A. They would refer to it, yes.	11 an analyst in this regard?
12 Q. Gotcha. And why would they refer to it?	12 A. When they're reviewing the information in MSOR.
13 A. To confirm that the steps were properly done.	13 Q. Do you know when the MSP legal unit is involved in the
14 Q. So they would use both the flowchart and the PACC	14 decision about whether a person with an out-of-state
15 chart?	15 conviction must register?
16 A. Per policy, yes.	16 A. When there's any question, we have a -- an analyst
17 Q. Gotcha. And so, when the tiers columns or publication	17 that is very familiar with this process, and she will
18 columns are blank in the PACC chart, you would need to	18 refer to legal if she is in any question.
19 use the flowchart to kind of help make that	19 Q. Who is that person?
20 determination?	20 A. Ms. Sharon.
21 A. I would assume so, yes.	21 Q. I'm sorry? I missed that, it broke up.
22 Q. And if there's a new offense that hasn't previously	22 A. Sharon Jegla.
23 come up, do you know if that is a situation where you	23 Q. Okay. Gotcha. And are there any other MSP staff
24 would also use the flowcharts?	24 involved in making determinations for these
25 A. Yes. And refer to legal.	25 out-of-state convictions?
Page 81	Page 82
1 A. Any analyst. She's the senior analyst that's very	1 A. I don't know.
2 familiar with the process, so she's often consulted.	2 Q. Do you know if there has been any systematic review to
3 Q. And do you know how many of these decisions are being	3 determine the accuracy of the classifications made in
4 made on average a month?	4 2011?
5 A. I do not know.	5 A. I wasn't here then, I don't know.
6 Q. Gotcha. Do you know -- never mind. I'm actually	6 Q. Do you know who is typically involved in updating the
7 going to stop sharing my screen again. We should be	7 chart when a determination is made?
8 good with this one. All right.	8 A. Yes, Ms. Sharon Jegla.
9 So were you aware that SORA was first	9 Q. Gotcha. And have you made any of these determinations
10 amended to require tiers in 2011?	10 since being in the SOR unit?
11 A. Say that again.	11 A. No.
12 Q. Were you aware that the SORA law was first amended to	12 Q. Gotcha. All right. And I'm going to switch gears
13 require tiers in 2011?	13 here a little bit from talking about the out-of-state
14 A. I have reviewed statute, I don't recall the exact	14 registration. And share my screen again, give me one
15 date.	15 second. Can you see that?
16 Q. Gotcha.	16 A. Yes.
17 A. Or year.	17 Q. Perfect. Let me make it smaller so you can see the
18 Q. So -- but you were aware that when -- initially when	18 whole thing. And I can briefly scroll through so you
19 SORA went into effect initially in 1995, there were no	19 can see everything that's in here. So this is what we
20 tier classifications at the time?	20 will mark as Exhibit D. This is Bates number 0001653
21 A. I believe so. I wasn't here at the time, I can't	21 through 1655 and 0001673.
22 really say for sure.	22 It appears to be letters sent to
23 Q. So would that mean that many offenses would have	23 registrants informing them of their registration
24 needed to be classified post-2011 once the tiers were	24 requirements. Have you seen these documents before?
25 created?	25 A. Yes.
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21 (Pages 81 to 84)

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1 MARKED BY THE REPORTER: 2 DEPOSITION EXHIBIT D 3 11:13 a.m. 4 BY MS. TILLMAN: 5 Q. And are you familiar with them? 6 A. No. 7 Q. But you have seen them before? 8 A. Yes. 9 Q. Gotcha. So these are four different letters. Just 10 based on what you do know about them or what you can 11 see, can you explain what the letters might have been 12 used for. 13 A. It appears to be an audit. As it states in the 14 letter, the department has performed an audit. 15 Q. And do you know who these letters went out to? 16 A. I'm assuming a sex offender. 17 Q. And you mentioned that, you know, based on your 18 reading that this was an audit, do you know what the 19 purpose of the audit might have been? 20 A. I do not. 21 Q. Gotcha. And do you know why there were four different 22 letters? 23 A. I do not. I was not here at that time. 24 Q. Gotcha. Do you know who might have written these 25 letters? Page 85	1 A. I can tell you that Mr. Shawn Sible was the one that 2 signed them. 3 Q. And it looks like -- 4 A. I don't know who -- 5 Q. Sorry, I didn't mean to interrupt you. 6 A. I don't know who wrote them. 7 Q. Gotcha. The first three letters are dated January 8 27th, 2023, and the last letter is dated February 9 24th, 2023. Do you see that? 10 A. Yes, I see that. 11 Q. Do you know what those dates mean? 12 A. I do not. 13 Q. Gotcha. Is it possible that that's the date that 14 these letters went out? 15 A. I would assume so. 16 Q. Gotcha. And you said you can see that it's signed by 17 Shawn Sible? 18 A. Yes. 19 Q. What's his position? 20 A. He's the assistant division director. 21 Q. Do you know what his responsibilities are as they 22 relate to SORA? 23 A. He's the assistant division director over CJIC, which 24 incorporates SOR. 25 Q. What might he -- what might his duties be that overlap Page 86
1 with the SOR unit? 2 A. He oversees my manager that oversees me. 3 Q. Gotcha. Do you know if anyone other than Mr. Sible 4 who signed off here was involved in drafting or 5 writing these letters? 6 A. I have no idea. 7 Q. And do you know at all if these are current letters? 8 If these are the current letters being used? 9 A. I do not know. 10 Q. Gotcha. Do you know how many of these letters might 11 have gone out? 12 A. I do not know. 13 Q. And since you've been in the registry, has the -- 14 since you've been with the SOR unit, excuse me, has 15 the SOR unit received any calls from registrants about 16 these letters? 17 A. I do not know. 18 Q. Gotcha. Let me pull these down then. Do you know or 19 are you aware if the SOR unit has ever needed to 20 classify a potential registrant with a federal 21 conviction? 22 A. I do not know. 23 Q. Do not know. So you're not sure if there's any 24 registrants in the -- currently on the registry who 25 are on the registry because of a federal conviction? Page 87	1 A. I don't know. 2 Q. Gotcha. Do you know if the steps of classifying a 3 registrant with a federal conviction might be 4 different or the same as the process for registering 5 out-of-state registrants? 6 A. I believe there's a policy on it. But I don't -- I 7 don't know it off the top of my head, no. 8 Q. Do you know what might be different in that policy 9 than is different in the out-of-state policy? 10 A. I do not know. 11 Q. Gotcha. 12 A. I'd have to review the policy. 13 Q. And do you know if there is a chart or cheat sheet 14 similar to the PACC code table that is used for 15 tiering federal offenses? 16 A. I do not know. 17 Q. And do you know if when tiering federal offenses a -- 18 a technician or an analyst might look under how an 19 offense is tiered under SORNA? 20 A. I'm assuming it's in policy. 21 Q. I'm going to share my screen again. Let me make it 22 bigger. Can you see that? 23 A. Yes. 24 Q. Perfect. Let me scroll over. And this will be what 25 we'll mark as Exhibit E. Page 88

22 (Pages 85 to 88)

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1   MARKED BY THE REPORTER:
2   DEPOSITION EXHIBIT E
3   11:18 a.m.
4   BY MS. TILLMAN:
5   Q. The Bates number is obscured here, but what I can make
6   out is -- well, MSP 0000716 through 717. Do you see
7   that?
8   A. Yes.
9   Q. Perfect. This appears to be a document listing
10   various Michigan offenses, tier levels, duration,
11   verification frequency and the like. Have you seen
12   this before?
13 A. I have.
14 Q. And are you familiar with this document?
15 A. Vaguely familiar.
16 Q. Gotcha. So just based on your experience with it,
17   what is it?
18 A. If you scroll to the left, it's based on MCL code, the
19   description, and then the tier level, duration, how
20   often that individual will verify.
21 Q. Gotcha. And do you know when this chart was created?
22 A. I do not.
23 Q. Do you know if it's been updated at all?
24 A. I do not.
25 Q. And I believe the bottom of the chart -- very, very,

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1   very small letters -- says that it was updated on
2   6/24/21. Do you see that?
3   A. I do.
4   Q. Does that sound right to you?
5   A. I wasn't here then.
6   Q. Fair. Do you know who created this chart, by chance?
7   A. I do not know.
8   Q. Do you know if it had to be approved by legal before
9   being used?
10 A. My assumption would be it went to legal for review,
11   but I don't know. I wasn't here then.
12 Q. Gotcha. So we kind of already talked about the fact
13   that it shows tier level, duration, verification
14   frequency for different registrable offenses in
15   Michigan, right?
16 A. Correct.
17 Q. And does it include all registrable offenses in
18   Michigan?
19 A. I do not know.
20 Q. Don't know, gotcha. Do you know how it is decided
21   which offenses would be included in this chart?
22 A. I do not know.
23 Q. Do you know if this chart is used in the SOR unit?
24 A. Yes, it is.
25 Q. Do you know who -- who in the SOR unit uses it?

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1   A. All of the staff refer to it.
2   Q. All the staff. Have you ever used it?
3   A. I have not.
4   Q. Do you know how the SOR unit uses this chart?
5   A. I'm assuming it's for reference on specific MCL codes,
6   but I do not.
7   Q. Gotcha. Do you know how often SOR staff members might
8   reference this chart?
9   A. I am unsure, I do not.
10 Q. Gotcha. And do you know if the SOR -- the SOR unit
11   staff refer to this chart when making tier
12   determinations?
13 A. My assumption is yes, but I believe it -- it is --
14 Q. Do --
15 A. -- referred to in policy.
16 Q. Which policy would that be?
17 A. I don't know.
18 Q. Gotcha. Is that a different policy than the ones that
19   you've been referring to previously?
20 A. No.
21 Q. It might be one of the same ones?
22 A. Uh-huh.
23 Q. Can you describe what that policy might be or what it
24   might say?
25 A. I don't recall.

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1   Q. Okay. And do you know if the -- when using -- if they
2   are using this chart to make tier determinations, are
3   they doing that for instate residents?
4   A. I'm assuming so. If its MCL code is listed, those are
5   State of Michigan offenses.
6   Q. Would they ever use this chart for out-of-state
7   registrants?
8   A. I don't know.
9   Q. And what about for federal convictions? Would they
10   use this chart?
11 A. I don't know.
12 Q. Gotcha. All right. So that is that one. All right.
13   So I just want to kind of review a few of the SOR
14   operating procedures we --
15   MR. DAMICH: Dayja, can I -- I'm sorry.
16   Can I take a break real quick before you get -- I'm --
17   I apologize.
18   MS. TILLMAN: No worries.
19   (Off the record 11:23 a.m.)
20   (Back on the record at 11:30 a.m.)
21 BY MS. TILLMAN:
22 Q. My last batch of questions for you, I want to go
23   through a couple of the SOR unit operating procedures,
24   just to basically get a better understanding of what
25   they mean.

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23 (Pages 89 to 92)

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1   So I'm going to pull up the first one for
2   you now. All right. Can you see that?
3 A. Yes.
4 Q. So this is what we will mark as Exhibit F.
5   MARKED BY THE REPORTER:
6   DEPOSITION EXHIBIT F
7   11:31 a.m.
8 BY MS. TILLMAN:
9 Q. This is Bates stamped 0000725 through 739. And it
10   appears to be SOR operating procedure 315 and it's
11   labelled SOR-OP-315. So have you seen this document
12   before?
13 A. Yes.
14 Q. Are you familiar with it?
15 A. Yes.
16 Q. And just can you briefly describe what this is.
17 A. The pending review process and procedure.
18 Q. And do you know when this procedure was initially
19   written?
20 A. I do not.
21 Q. Do you know who happened to write it?
22 A. I do not.
23 Q. It shows a revision date of August 2nd, 2022. Do you
24   see that?
25 A. I do.

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1 Q. Do you know why this policy might have been revised?
2 A. I do not.
3 Q. Do you happen to know what revisions were made from
4   the last iteration?
5 A. I do not.
6 Q. Do you know who was involved in revising it?
7 A. I do not.
8 Q. And do you know who might have signed off on it?
9 A. I'm assuming the manager.
10 Q. Gotcha. Do people other than those in the SOR staff
11   unit ever get involved in decisions about revisions to
12   operating procedures?
13 A. Yes.
14 Q. Who might that be?
15 A. The managers within CJIC above the SOR unit manager
16   and legal.
17 Q. Gotcha. Does the Attorney General's Office ever get
18   involved in revisions or questions about changing
19   operating procedures?
20 A. If there's questions from legal.
21 Q. Are you aware of any other instances where the
22   Attorney General's Office may have been involved in
23   decisions about how data is entered into the MSOR
24   database?
25 A. I am not. I don't know.

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1 Q. Gotcha. And is this a -- going back to the exhibit --
2   is this an operating procedure that is used or
3   referenced by the SOR unit?
4 A. Yes.
5 Q. And let's just go down to page ten. This is page ten.
6   So here it has -- it's -- it talks about the committed
7   date. I'm going to read section C here, which says
8   effective March 2nd, 2021, per the Michigan Attorney
9   General's Office, if the committed date is in a date
10   range and our office is unable to obtain the exact
11   date that is associated with the conviction, use the
12   most recent committed date.
13   For example, if the dates are 01/20/2010 to
14   07/1/2020 and an exact date cannot be obtained, use
15   07/01/2020 as the committed offense date. Do you see
16   that there?
17 A. I do.
18 Q. Perfect. Do you know who wrote that?
19 A. I do not.
20 Q. Gotcha. Do you know what the purpose of using the
21   last date as the committed date was?
22 A. I do not.
23 Q. If you don't, do you know why -- or let me rephrase
24   this question.
25   Because you don't know the purpose of why

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1   that was used as the committed date, do you know why
2   they wouldn't just use a date --
3   MR. DAMICH: Objection, lack of foundation.
4 BY MS. TILLMAN:
5 Q. You can answer if you can.
6 A. I don't know.
7 Q. Gotcha. Do you know if the effect of this is to make
8   the committed date as late as possible?
9 A. I'm sorry, what was the question?
10 Q. Do you know if the effect of this is to make the
11   committed date as late as possible?
12   MR. DAMICH: Objection, lack of foundation.
13   THE WITNESS: I don't know.
14 BY MS. TILLMAN:
15 Q. But the committed date could affect whether someone
16   has an ex post facto claim, right?
17   MR. DAMICH: Objection, lack of foundation.
18   THE WITNESS: Can you repeat that.
19   MS. TILLMAN: I can withdraw the question.
20 BY MS. TILLMAN:
21 Q. So I want to bring your attention to page nine now.
22   So here I'm going to highlight it so you can see what
23   I'm referring to. It says if an offender commits a
24   new Michigan felony after 3/24/2021 and they have a
25   previous sex offense that they were not previously

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24 (Pages 93 to 96)

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1 registered for, they must now register for that old	1 official position about how the recapture provisions
2 offense.	2 of SOR 2021 should be interpreted?
3 I., if the old offense is a tier I or tier	3 MR. DAMICH: Objection, lack of foundation.
4 II and the fifteen or twenty-five years has ended, the	4 BY MS. TILLMAN:
5 offender would not be required to register. A.,	5 Q. You can answer if you know.
6 incarceration time can only be added for time spent in	6 A. I don't know. I wasn't here when this was written.
7 prison/jail for the old offense and not any	7 Q. So based on this policy, is it fair to say that MSP's
8 incarceration time in between the old offense and the	8 position is that if a person who has an old sex
9 new felony.	9 offense for which that person never had to register,
10 And subsection B reads if the offender is	10 if that person commits a new felony after that
11 being registered due to the recapture provision in the	11 3/24/2021 date, that person now has to register?
12 SOR law, ensure the recapture box, quote/unquote, is	12 A. Based on this policy, that's what's stated, unless the
13 checked in the MSOR offense modal. And then finally	13 old offense is a tier I and tier II and the fifteen or
14 B.i. states if it is questionable as to whether the	14 twenty-five years has ended.
15 recapture box is checked, follow the chain of command.	15 Q. Gotcha. And based on this policy, is it MSP's
16 Do you know who wrote this?	16 position that periods of incarceration can be deducted
17 A. I do not.	17 from a fifteen- or twenty-five-year registration
18 Q. Do you know who was involved in signing off on it?	18 period if for the initial offense but not for the
19 A. I would --	19 other periods of incarceration?
20 MR. DAMICH: Objection, lack of foundation.	20 A. It states incarceration time can only be added for the
21 THE WITNESS: -- assume the manager.	21 time spent in prison/jail for the old offense and not
22 BY MS. TILLMAN:	22 any incarceration time in between the old offense and
23 Q. You can answer.	23 new felony.
24 A. I would assume the manager.	24 Q. Gotcha. All right. And that's it on this one. So
25 Q. Does this -- do you know if this represents MSP's	25 instead of un-sharing, I'm going to attempt to just
Page 97	Page 98

1 share the next document.	1 Q. And do you know why it might have been revised on that
2 A. Okay.	2 date?
3 Q. Do you see this one?	3 A. I do not know.
4 A. Offender duration has ended.	4 MR. DAMICH: Objection to foundation.
5 Q. Perfect. So this is what we will mark as Exhibit G.	5 BY MS. TILLMAN:
6 It's Bates stamped 0000911 through 913. This appears	6 Q. You can answer if you know the answer.
7 to be SOR operating procedure 308. It's labelled	7 A. I don't know.
8 SOR-OP-308. Have you seen this document before?	8 Q. Do you know what revisions might have been made?
9 A. I have.	9 A. I do not know.
10 Q. Are you familiar with it?	10 Q. And do you know who might have been involved in
11 A. Yes.	11 revising it?
12 MARKED BY THE REPORTER:	12 A. I don't know.
13 DEPOSITION EXHIBIT G	13 Q. Do you know if it's been revised since May 4th, 2022?
14 11:39 a.m.	14 A. Not to my knowledge.
15 BY MS. TILLMAN:	15 Q. Gotcha. And is this an operating procedure that's
16 Q. Gotcha. And based on your experience with this	16 used or referenced by the SOR unit?
17 policy, can you describe what it is.	17 A. Yes.
18 A. This is the procedure that's followed when offender	18 Q. Does this policy provide guidance on how to calculate
19 duration has ended.	19 when a tier I or tier II registrant comes off the
20 Q. Do you know when it was originally written?	20 registry after the fifteen- or twenty-five-year
21 A. I do not.	21 duration?
22 Q. Do you happen to know who wrote it?	22 A. I would have to review the policy and procedure.
23 A. I do not.	23 Q. What is your understanding of what this policy
24 Q. And do you see the revision date for May 4th, 2022?	24 outlines?
25 A. Yes, ma'am.	25 A. I believe it's used for auditing when someone is about
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25 (Pages 97 to 100)

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1 to end their duration.	1 1990? Or in 1995 when SORA goes into effect?
2 Q. And that, of course, would only apply to tier I and	2 MR. DAMICH: Objection, form, compound,
3 tier II registrants?	3 confusing, ambiguous.
4 A. If that's what it states on here.	4 BY MS. TILLMAN:
5 Q. And do you know the process of how time is calculated	5 Q. You can answer if you know.
6 for registrants who are on the fifteen- or	6 A. I don't know.
7 twenty-five-year duration?	7 Q. So if an offense is -- or if someone is convicted of
8 A. It's based on MCL.	8 an offense before the registry goes into effect, when
9 Q. Which MCL is that?	9 does the clock start?
10 A. I don't know off the top of my head.	10 A. I don't know. I wasn't here at that time.
11 Q. Do you know what that MCL describes as the calculation	11 Q. Gotcha. Do you know if MSP has attempted to identify
12 process?	12 any individuals who might be in a situation where they
13 MR. DAMICH: Objection, lack of foundation.	13 were convicted in 1990 but were added to the registry
14 BY MS. TILLMAN:	14 post-1995?
15 Q. You can answer if you know.	15 A. I don't know.
16 A. I don't know.	16 Q. Gotcha. All right. And I'm going to do the thing
17 Q. Do you happen to know when the clock starts running on	17 again where I'm going to try to switch it to this
18 registration?	18 instead of un-sharing my screen. Can you see that?
19 A. I don't know off the top of my head.	19 A. Yes.
20 Q. So just to do a brief hypo, say a person committed an	20 Q. Perfect. Perfect. And so, this is what we will mark
21 offense in around 1990. They never went to prison,	21 as Exhibit H. It is Bates stamped 0001624 through
22 but they were sentenced to five years of probation and	22 1626.
23 they're still on probation when SOR goes into effect	23 MARKED BY THE REPORTER:
24 in 1995.	24 DEPOSITION EXHIBIT H
25 Do you know if the clock starts running in	25 11:43 a.m.
Page 101	Page 102
1 BY MS. TILLMAN:	1 referenced within the SOR unit?
2 Q. And this appears to be SOR operating procedure 322,	2 A. Yes.
3 with the label SOR-OP-322. Have you seen this	3 Q. And is this policy related to how the unit responds
4 document before?	4 once the SOR unit has been notified by another state
5 A. I have.	5 that a non-Michigan registrant has moved to Michigan?
6 Q. And are you familiar with it?	6 A. Say that again.
7 A. Yes.	7 Q. For sure. So does this policy outline how the SOR
8 Q. And just based on your experience with it, can you	8 unit responds once they have been notified by another
9 describe what it outlines.	9 state that a registrant had moved to Michigan?
10 A. My understanding is it outlines those are pending	10 A. Yes.
11 arrival here in the state.	11 Q. Gotcha. And can you just quickly walk us through how
12 Q. Gotcha. Do you know when this policy was originally	12 the SOR unit might typically respond in this
13 written?	13 situation.
14 A. I do not know.	14 A. It would be following this policy. I'm not very
15 Q. Do you happen to know who wrote it?	15 familiar with it.
16 A. I do not know.	16 Q. Gotcha. And do you know if any of the steps in that
17 MR. DAMICH: Objection, lack of foundation.	17 policy are different from any of the other
18 BY MS. TILLMAN:	18 registration policies that we've talked about?
19 Q. Do you see the revision date of July 12th, 2022, up	19 A. I do not know.
20 there?	20 Q. Gotcha. Do you know off the top of your head which
21 A. Yes, ma'am.	21 policy, besides this one of course, might be relevant?
22 Q. Do you know if this policy has been revised since that	22 A. No, I don't know.
23 date?	23 Q. Gotcha. Looking at page two, section four A three --
24 A. Not to my knowledge.	24 where did it go. Here we go, in this little section
25 Q. And is this an operating procedure that is used or	25 here, I'm going to briefly read the relevant
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1   provisions. So four -- subsection four states the
2   department technician shall perform a search within
3   ten business days of said date of arrival in MSOR to
4   determine if the offender has checked in with
5   Michigan.
6   And then subsection A of four says if the
7   department technician has determined a new offender
8   has checked in with Michigan and has signed a
9   registration form, all of these other provisions will
10   obviously take place, including a request -- if
11   requested by the notifying state it would notify the
12   state that the offender has arrived and the
13   notification was sent through the SORNA exchange
14   portal, close the notification in the SORNA exchange
15   portal.
16   And it kind of lists how that is done. And
17   then subsection two says if it is an exiting offender,
18   a signed registration form is not necessary. And
19   subsection three says the department technician does
20   not need to perform a complete pending review on the
21   record, only determine if the offender record should
22   be published or not.
23   Do you see all of that?
24   **A.** I do.
25   Q. Perfect. Do you know the difference between a

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1   complete pending review and the one described here,
2   where only -- where they might be only deciding on
3   publication status?
4   **A.** I don't. I don't know.
5   Q. Are you not familiar with that process?
6   **A.** No, I'm not.
7   Q. Do you know if records under this scenario four A
8   three ever go through a complete review?
9   **A.** I don't know.
10   Q. Do you happen to know if there's any followup on that
11   record?
12   **A.** I do not know.
13   Q. Gotcha. All right. I will stop sharing my screen.
14   MS. TILLMAN: That is all I've got right
15   now, but if you give me about five minutes or so just
16   to like go through my notes, make sure I don't have
17   any other questions. Is that okay?
18   MR. DAMICH: Yeah, absolutely.
19   (Off the record 11:48 a.m.)
20   (Back on the record at 11:55 a.m.)
21   MS. TILLMAN: I have just got literally
22   like maybe one or two more questions for you.
23   BY MS. TILLMAN:
24   Q. So earlier we kind of like walked through the instate
25   registration process for registrable offenses in

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1   Michigan. And so, I want to kind of go back and ask
2   once MSP -- or once MSP completes a record and a
3   determination is made that an individual who's instate
4   must register for, you know, fifteen, twenty-five, or
5   lifetime, how is that then communicated to a
6   registrant, if you know?
7   **A.** I don't recall.
8   Q. Don't recall, gotcha. Do you know if the tier letters
9   that we looked at earlier might be sent out to them?
10   Or if something similar might be sent out to them?
11   MR. DAMICH: Objection, lack of foundation.
12   BY MS. TILLMAN:
13   Q. You can answer if you know.
14   **A.** I don't recall.
15   Q. You don't recall, gotcha. Do you recall any method at
16   all of the SOR unit or MSP communicating to
17   registrants what their registration obligations might
18   be?
19   **A.** I believe there's a letter out there. But I don't --
20   I don't recall exactly what it is.
21   MS. TILLMAN: All right. Then that is all
22   of my questions. So, Scott, unless you have some
23   questions.
24   MR. DAMICH: You know what, I don't
25   actually.

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1   MS. TILLMAN: Great. So I actually want to
2   make one statement for the record and then I will be
3   all done, I promise.
4   MR. DAMICH: Okay.
5   MS. TILLMAN: So I want to state for the
6   record that, you know, defendants had an obligation to
7   provide a witness who, you know, in a 30(b)(6)
8   deposition who can testify to all the topics related
9   -- relayed in the Notice of deposition.
10   Of course, our witness today was able to
11   respond to many questions, but we do not necessarily
12   feel that the defense adequately complied with that
13   obligation because the witness was not able to respond
14   to many questions about the policies and procedures.
15   So I want to state that for the record.
16   MR. DAMICH: Noted.
17   MS. TILLMAN: Other than that, I think that
18   I'm all good on my side. I do really want to thank
19   you for your time today. I'm sure it's never fun to
20   sit in these things for three-plus hours.
21   But I do really appreciate you taking the
22   time to talk to us through kind of many of the things
23   that we're not really aware of that's gone on inside
24   of the SOR unit. So it was very helpful. So I really
25   appreciate it.

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1 THE WITNESS: Thank you.	1 CERTIFICATE
2 (The deposition was concluded at 11:58 a.m.	2
3 Signature of the witness was not requested by counsel	3 STATE OF MICHIGAN
4 for the respective parties hereto.)	4 COUNTY OF MACOMB
5	5 I, Heather DeMar, RPR, CSR, and Notary
6	6 Public in and for the above county and state, do
7	7 hereby certify that this deposition was taken before
8	8 me at the time and place hereinbefore set forth via
9	9 videoconference; that the witness was by me first duly
10	10 sworn to testify to the truth; that this is a true,
11	11 full and correct transcript of my stenographic notes
12	12 so taken; and that I am not related, nor of counsel to
13	13 either party, nor interested in the event of this
14	14 cause. I agree that I nor any person, attorney,
15	15 paralegal, or expert witness may make, copy, and/or
16	16 distribute to others for future sales, monetary gain,
17	17 or any other purpose, a transcript and/or video
18	18 without paying Tri-County Court Reporters the ordinary
19	19 and customary charges for any and all additional
20	20 transcripts. Transcript completed 6/17/2023.
21	21 _____
22	22 Heather DeMar, RPR, CSR - 8951
23	23 Notary Public.
24	24 Macomb County, Michigan
25	25 My Commission Expires: 12/18/2027
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